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DATE: FEB 29 2000

SUBJECT:

FROM: JL

TO:

THROUGH:

Facility:

Also, the analysis indicates that the subject company incurred significant capital purchases of $122,265,000 during the period 1996 through nine months ending September 30, 1999.

Debt:

The subject firm's debt level was $153,388,000 as of September 30, 1999, summarized as follows:

loan	amount
senior secured notes	$100,000,000
revolving credit facilities:	
Keystone	41,500,000
Engineered Wire Products	5,300,000
Garden Zone	4,000,000
term loan - Engineered Wire Products	583,000
other	2,005,000
total	$153,388,000

The senior secured notes are due August, 2007. The Keystone revolving credit facility matured on December 31, 1999 and the firm planned to renegotiate the terms of this loan agreement. The Engineered Wire Products revolving credit facility matures June, 2000.

Accounts Payable:

Keystone Consolidated Industries, Inc. unpaid bills was $23,377,000 as of September 30, 1999.

Accounts Receivable:

Keystone Consolidated Industries, Inc. uncollected revenue amounted to $38,625,00 as of September 30, 1999.

Capital Assets:

The recorded book value (cost less accumulated depreciation) of capital assets amounted to $150,531,000 as of September 30, 1999.

Capital Purchases:

The subject company made the following capital purchases during years ending December 31, 1994 through December 31, 1998 and also nine months ending September 30, 1999:

year ending	purchases
12/31/94	$12,742,000
12/31/95	18,208,000
12/31/96	18,992,000
12/31/97	26,294,000
12/31/98	64,541,000
9/30/99	12,438,000

Business Acquisitions:

The subject firm acquired DeSoto, Inc. during 1996 and Engineered Wire Products, Inc. during 1997.

Revenues:

Keystone Consolidated Industries, Inc. reported the following revenue amounts for calendar years 1994 through 1998 and also nine months ending September 30, 1999:

year ending	revenues
12/31/94	$364,435,000
12/31/95	345,657,000
12/31/96	331,175,000
12/31/97	354,073,000
12/31/98	370,022,000
9/30/99	277,379,000

Net Income/Loss:

Keystone Consolidated Industries, Inc. reported the following net income or loss amounts for years ending December 31, 1994 through December 31, 1998 and also nine months ending September 30, 1999:

year ending	net income/loss
12/31/94	$7,561,000
12/31/95	4,887,000
12/31/96	2,584,000
12/31/97	12,368,000
12/31/98	3,911,000
9/30/99	-1,987,000

Environmental Issues:

The subject firm is currently involved in the closure of inactive waste disposal units at its Peoria facility pursuant to a closure plan approved by the Illinois Environmental Protection Agency in September 1992.

In addition, the subject firm is a potentially responsible party (PRP) at several Superfund sites. Also, the firm is involved in other non Superfund cleanup efforts.

Future Environmental Costs:

As of September 30, 1999, the firm estimates it will spend $17,631,000 for future environmental remediation efforts.

Environmental Trust Funds:

The firm deposited a total of $8,100,000 in environmental trust funds as of December 31, 1998, summarized as follows:

properties	trust fund
Peoria facility	$3,600,000
DeSoto facilities	4,500,000

$8,100,000

Conclusion/Recommendations:

Financial Condition:

The financial condition of Keystone Consolidated Industries, Inc. was fair overall as of nine months ending September 30, 1999. The company recorded net income of $31,311,000 during the period 1994 through 1998. However, the firm recorded a net loss of $1,987,000 through nine months ending September 30, 1999. During 1997 the firm started a $75,000,000 capital expansion program which was funded through additional loans. Debt is significant at a total of $153,388,000 as of September 30, 1999. The Keystone revolving credit loan of $41,500,000 was due on December 31, 1999 and the firm planned to renegotiate the terms of this loan agreement. The senior secured notes of $100,000,000 is not due until August, 2007.

Ability To Pay:

During 1996 and 1997 management made several key decisions to spend millions of dollars for both business acquisitions and a capital improvement program. These decisions were made even though the firm was obligated to spend millions of dollars for environmental remediation efforts at several Superfund and non Superfund sites. Therefore, the analyst assumes management did not consider the ability to pay future environmental obligations a serious problem. The firm's estimated future environmental costs of $17,631,000 at September 30, 1999 is only slightly higher than a previous estimate of $16,104,000 at December 31, 1997.

Assuming the financial condition does not worsen, the analyst believes Keystone Consolidated Industries, Inc. will continue to pay for all new future environmental remedial costs. This conclusion is based on the fact that the firm has been profitable in the past and has also committed $8,100,000 to environmental trust funds at December 31, 1998.

The financial analyst is available to participate in settlement negotiations if financial support is helpful. Also, the financial analyst is available to testify as an expert witness with regards to the area of financial analysis upon your request. If you have any questions with regards to these findings and recommendations, please call me at 886-4077.

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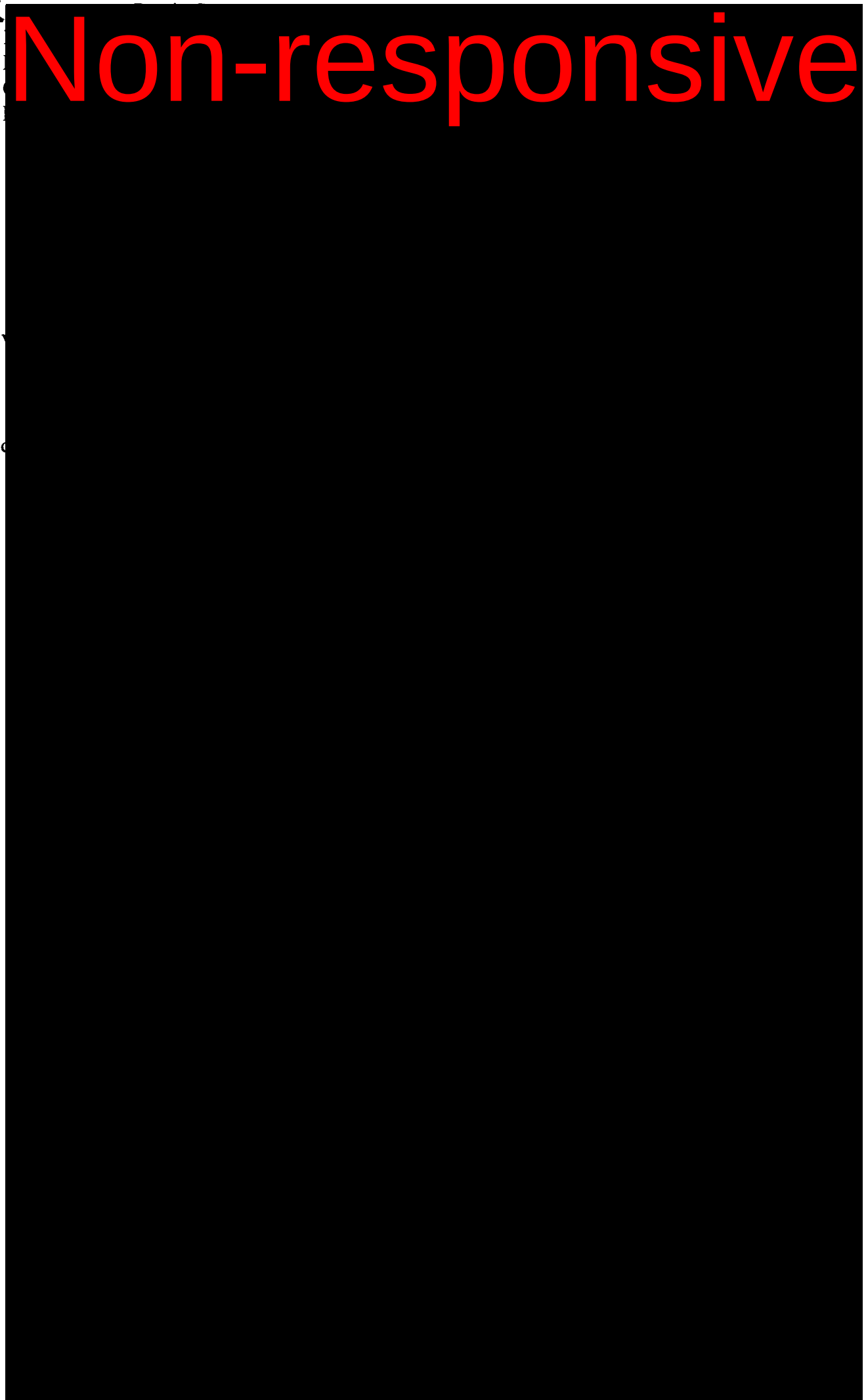
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From: PAUL RUESCH
To: JEREZA-LORNA, RUSSELL-BARBARA
Date: 4/8/96 10:10pm
Subject: Illinois Complaint

This referral comes via Region 4.

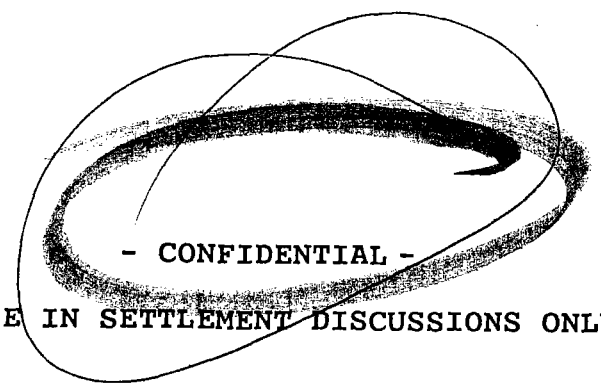
A complainant, Roland McKipprick (309/682-7516), **employed at Keystone Steel & Wire** Recyclers, is alleging sham recycling activities **at the above mentioned** facility. Would the appropriate person in **IL Enforcement** follow up on this?

Please keep anonymous ~~#~~.
Please I would like to remain anonymous

Keystone Steel & Wire Recyclers
7000 So. West Adams
Peoria, Illinois 61641

illegal disposal
lead problems
Employee died of lead poison
3 or 4 months ago.

SEDIMENT TREATMENT PROPOSAL SUBMITTED TO THE UNITED STATES IN CONNECTION WITH SETTLEMENT DISCUSSIONS IN CASE NO. 86-1212 (U.S. DISTRICT COURT, CENTRAL DISTRICT OF ILLINOIS)



FOR USE IN SETTLEMENT DISCUSSIONS ONLY

AUGUST 26, 1987

James W. Polich, P.E.
ERM-NORTH CENTRAL, INC.
102 Wilmot Road
Suite 300
Deerfield, Illinois 60015

Consultant to Keystone
Consolidated Industries, Inc.

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Dan Bakk 7/3

Joe B - please get back to Jean on this. Thanks, Bill

Is this 85-R-036? Jean

Keystone Consolidated Industries, Inc.

Three Lincoln Centre
5430 LBJ Freeway, Suite 1440
Dallas, Texas 75240
(214) 458-0028

June 28, 1990

Via - Registered Mail

U.S. Environmental Protection Agency
Region V
P O Box 70753
Chicago, Illinois 60673

Re: United States of America v. Keystone Consolidated Industries, Inc. Civil Action No. 86-1212

Gentlemen:

Pursuant to paragraph 12 b, c and 16 of the Consent Decree in the matter of the United States of America v. Keystone Consolidated Industries, Inc., Civil Action No. 86-1212 in the United States District Court for the Central District of Illinois, enclosed is a certified check in the amount of $289,444 being the balance of the civil penalty specified in paragraph 12 b and c along with interest specified in paragraph 16.

Sincerely,

Ralph P. End
Corporate Counsel

RPE/lsa

enc

cc: U.S. EPA, Region V
Waste Management Division
RCRA Enforcement Branch, 5HS-12
230 South Dearborn Street
Chicago, Illinois 60604

Andy Running
Les Phillips

LG2899C

$30,000 paid - 7/29/88

$250,000 due - 6/29/90 plus interest from 6/29/88

$289,444 paid - 6/29/90

interest $39,444 ?

7.6% compounded annually

Non-responsive

LIST OF FIGURES

INTRODUCTION

Overview

The Keystone Steel & Wire Company manufacturing complex (Keystone) is located in Bartonville, Illinois, just east of U.S. Route 24, about 1/2 mile west of the Illinois River. Keystone has been at this location since approximately the turn of the century and has produced nails, barbed wire, and fence wire throughout most of that period. As part of the manufacturing process, sulfuric acid is used in steel rod-cleaning operations. Prior to October 1, 1986, spent acid was mixed with significant volumes (5,000,000 gallons per day) of non-hazardous plant wastewaters and then discharged into a series of ditches to the east of the manufacturing buildings, as shown on Figure 1.

Spent acid was discharged at two points within these ditches: one discharge was to the Mid Mill Ditch, and the other was to the north half of the South Ditch. All waters from the south half of the South Ditch were then pumped to a Twenty-Four Hour Retention Reservoir, and from the Reservoir to the adjacent NPDES-permitted wastewater treatment plant. Since October 1, 1986, the spent acids and other wastewaters have been pumped via a newly-constructed pipeline to the wastewater treatment plant.

The ditches shown on Figure 1 receive considerable amounts of surface run-off, both from the Keystone complex as well as surrounding off-property areas. On occasion, during heavy rains and flooding conditions, the Mid Mill Ditch may flow back into the North Ditch.

Sediments contained in the ditches and Twenty-Four Hour Retention Reservoir (hereinafter collectively referred to as "the impoundments") are considered potentially hazardous by federal and state regulatory agencies because the sediments have been in contact with spent pickle liquor, a listed hazardous waste (K062). Two dredge piles (the North Dredge Pile and the South Dredge Pile) consisting of sediments removed in the past from the South Ditch by Keystone have also been claimed to be potentially hazardous.

Purpose of Study

In anticipation of settlement discussions and the possible trial of the current litigation brought by the United

States in the federal court in Peoria, ERM-North Central was retained by Keystone and its legal counsel to develop a proposal for the treatment of the bottom sediments in the impoundments. 1/

STUDY CONDUCT

Existing Data Review

The sediment test data compiled by Geosciences Research Associates in their April 20, 1987 report show that the sediments in the North Ditch, Mid Mill Ditch and the South Ditch (North and South Half) have extremely low EP Toxicity values for metals, near or below the laboratory detection limits. Of concern are the EP Toxicity levels for lead in the Twenty-Four Hour Retention Basin and (based on the first but not the second series of tests) the surface drainage ditch. Reactive sulfide levels were also, at some test locations, greater than the informal, interim EPA action level of 500 mg reactive hydrogen sulfide per kg waste detailed in a memorandum prepared by Eileen Claussen, Director, U.S. EPA Characterization & Assessment Division. While there are substantial grounds to question the applicability of this interim action level, we have designed this sediment treatment proposal to preclude any credible hydrogen sulfide exposure concerns.

The reactive sulfide and EP Toxicity results for the two dredge piles show these materials do not constitute any environmental concerns.

Our sediment treatment program was designed to meet the following objectives:

(1) Creation of a treated medium in which significant quantities of hydrogen sulfide gas would not be formed.

(2) Prevention of future sulfide formation via continued anaerobic decomposition of sulfate salt.

(3) Conversion of soluble lead, as indicated by the EP Toxicity results, to lead hydroxide.

1/ ERM-North Central was not retained to express any opinion on the necessity (from legal or human-health standpoints) of any treatment measures, but has studied the efficacy of the treatment scheme proposed herein.

Development of Treatment Concept

Treatment of soluble lead is well documented. The preferred treatment process consists of lime addition to raise the pH to 9.5 to 10.0, with the subsequent formation of insoluble lead hydroxide.

The lime treatment also serves to provide a basic medium in which hydrogen sulfide gas cannot form.

Nitrate addition inhibits sulfide production as long as the redox potential of the waste is raised above 300 mv.

The interim action level of 500 mg reactive hydrogen sulfide per kg waste set forth in Eileen Claussen's memorandum is based on the assumption that an off-site commercial hazardous waste facility would inadvertently mix the waste with sufficient amounts of acid such that the resultant pH of the mixture would be 2.0, causing hydrogen sulfide gas to be released at toxic levels. Those assumptions would not be applicable to the treated sediment after completion of the program proposed herein. Given the total volume of sediment in the impoundments (estimated from the Geosciences data to be 70,000 cubic yards) and the planned excess of lime, there is no credible scenario under which enough acid would reach the treated sediment so as to exceed the buffering capacity of the lime. The proposed relocation of lime-stabilized sediment to the Twenty-Four Hour Retention Basin would therefore preclude the Agency's stated concerns about the generation of toxic levels of hydrogen sulfide gas.

Conceptual Treatment Process

The recommended treatment program for the bottom sediments is therefore as follows:

(1) Addition of hydrated lime to raise the pH to a residual value of 9.5 to 10.0, for precipitation of lead as lead hydroxide.

(2) Addition of calcium nitrate to increase the redox potential for further inhibition of sulfate-reducing bacteria.

The following section discusses in detail the proposed sediment treatment and relocation program.

PROPOSED TREATMENT METHODS

Description of Methods

The treatment system proposed herein (Figure 2) consists of a dedicated, on-shore treatment plant that would provide for the sequential treatment of dredged sediments from the impoundments as follows:

(1) Sediment will be removed and pumped on-shore by a portable hydraulic dredge.

(2) A 10% slurry of hydrated lime will be added to a completely mixed reaction tank for formation of lead hydroxide.

(3) Adjustment of pH with lime to a residual value of 9.0 to 10.0 will minimize the solubility of lead hydroxide. Added nitrates will reduce the potential formation of hydrogen sulfide. In the unlikely event that hydrogen sulfide forms the lime will also prevent any release of hydrogen sulfide gas. pH will be monitored by instrumentation to control the valve feeding the lime slurry into the lead precipitation tank, so as to ensure addition of excess lime.

(4) Calcium nitrate will be added to a completely mixed tank (calcium nitrate mix tank) to increase the redox potential for further long-term inhibition of sulfate-reducing bacteria in the treated sediments. Calcium nitrate addition will be controlled by a variable-speed metering pump as monitored by a predetermined ORP set point.

(5) All treated sediments would be directed back to the Twenty-Four Hour Retention Reservoir which will then function as a sludge dewatering basin. As the treated sediments settle, water will be decanted from the surface to accelerate dewatering. Any waters so removed will be discharged to the existing NPDES-permitted wastewater treatment plant.

(6) After the treated sediments have dewatered, the Twenty-Four Hour Retention Reservoir will be filled with clean backfill to slightly above existing grade. A two-feet thick clay

layer will be placed over the backfill, and two feet of clean dirt placed over the clay. A grass cover will then be planted and maintained to control and minimize any future surface erosion.

The use of hydrated lime for the treatment of lead is identical to that employed in the existing NPDES-permitted wastewater treatment plant.

Order of Treatment

The Twenty-Four Hour Retention Reservoir will be treated first. Treated sediments will be discharged back into the Reservoir.

The sediments in the various ditches will next be removed by hydraulic dredge, treated and discharged to the Twenty-Four Hour Retention Reservoir. Once the ditches have been dredged, the sediments in the Surface Drainage Ditch will be removed by backhoe, treated, and also discharged to the Twenty-Four Hour Retention Reservoir. Finally, the two dredge piles will be hauled by truck to the Twenty-Four Hour Retention Reservoir.

Laboratory, Pilot and Other Studies

The treatment process previously described represents a sound technical approach, based on literature and prior engineering experience. Additional field studies are planned prior to drafting operating drawings and system specifications. These studies would include field sampling to better measure impoundment sediments and to obtain design parameters such as in-place solids concentrations and bulk densities.

Immediately after completion of these field studies, we recommend a two-step laboratory/pilot study to determine the chemical dosage rates for treatment. These studies are outlined below. Figure 3 summarizes these additional studies on a time-event chart.

Field Sampling

Additional field sampling is planned for the following purposes:

(1) Determine vertical and horizontal variations in sediment bulk density in the impoundments.

(2) Determine vertical and horizontal variation in suspended solids concentrations in the impoundments.

(3) Confirm sediment depths in the impoundments.

Treatment Studies

Bench-scale treatment tests would be performed for the following purposes:

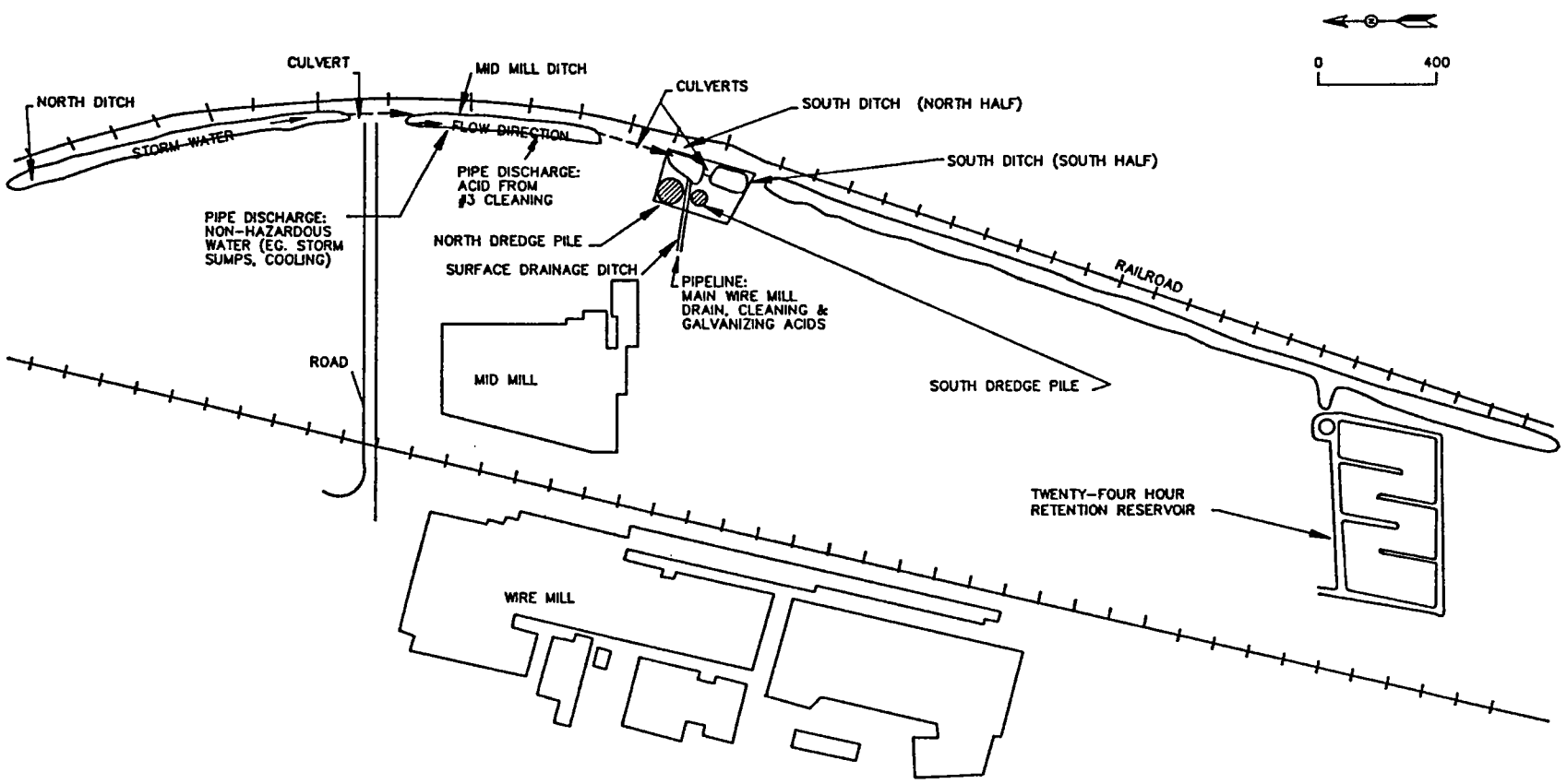
(1) Obtain representative sediment samples from impoundments for use in conducting laboratory and bench-scale treatment studies.

(2) Determine optimum lime dosage. Establish target pH range for lime addition, required retention time and expected pH decay with time.

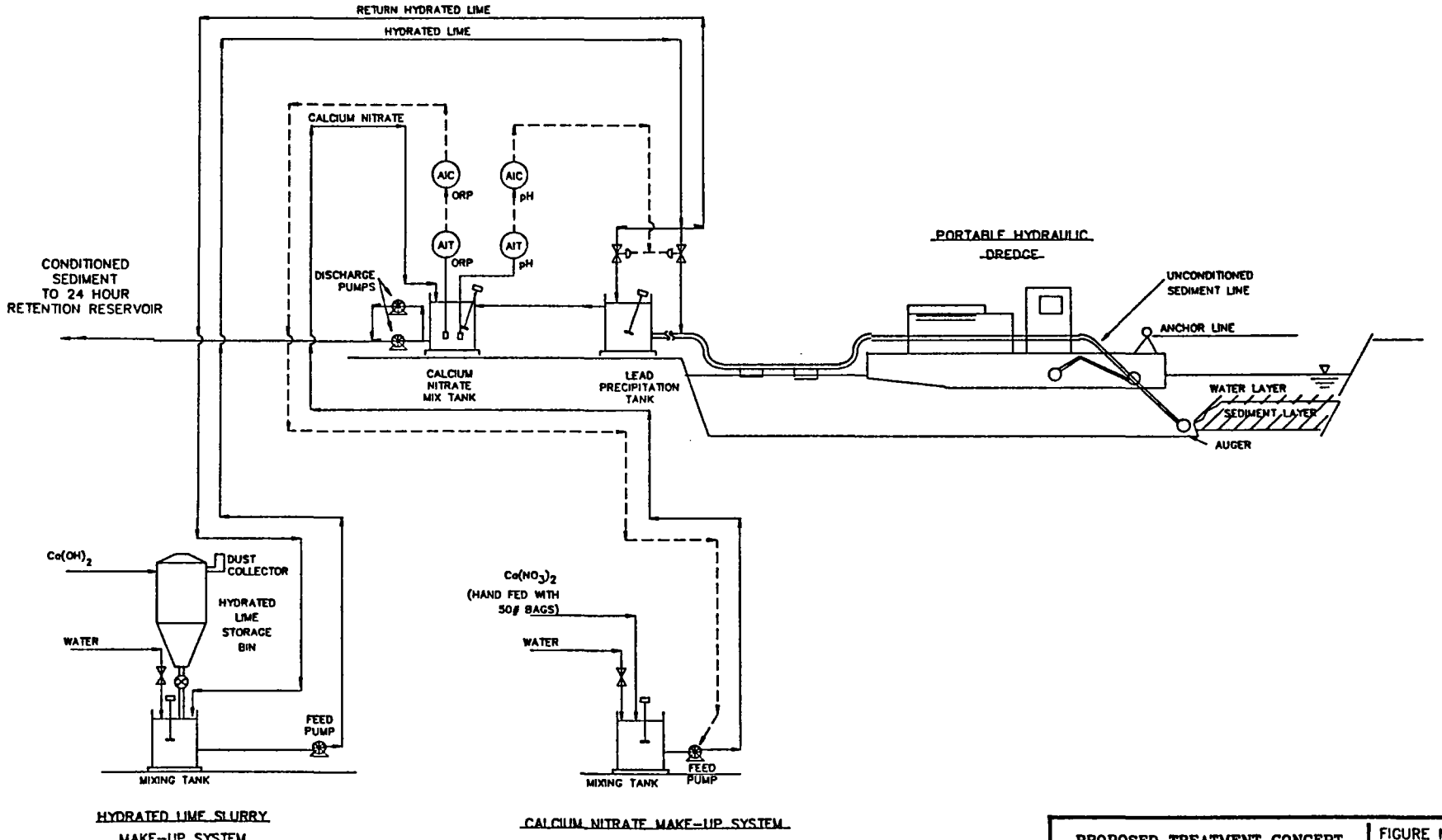
(3) Derive required dosage levels of calcium nitrate. Define the target redox potential range to be used for automatic control of calcium nitrate addition.

(4) Establish proper sequence for addition of chemicals for optimum performance.

Immediately after the bench-scale tests, we would implement a pilot demonstration of the final treatment process in one of the South Ditch sections to confirm resolution of logistical problems, mechanical difficulties, sediment handling techniques, treatment results, and sediment stability after treatment.



KEYSTONE STEEL & WIRE COMPANY BASE MAP	FIGURE NO. 1
ERM ERM-North Central, Inc.	

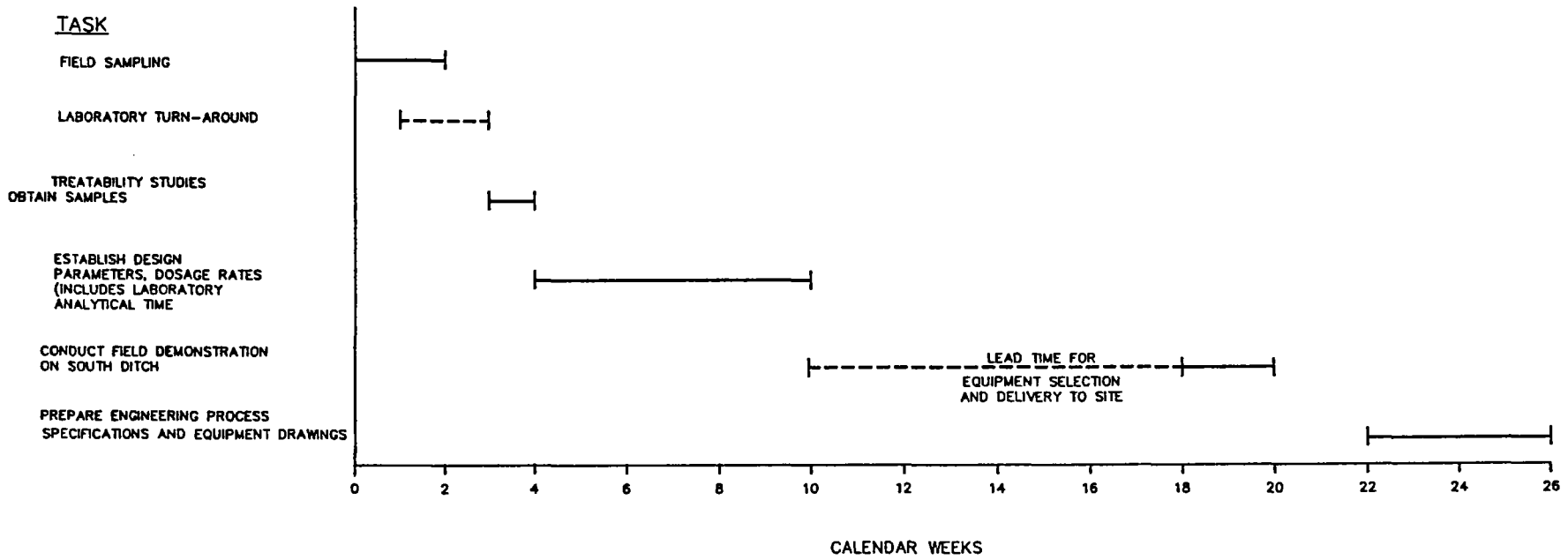


PROPOSED TREATMENT CONCEPT
KEYSTONE STEEL & WIRE COMPANY

ERM ERM–North Central, Inc.

FIGURE NO.

2



TIME-EVENT CHART
KEYSTONE STEEL & WIRE COMPANY

ERM-North Central, Inc.

FIGURE NO.
3

KP

PRC Engineering

prc
Planning Research Corporation

KEYSTONE GROUP - BARTONVILLE PLANT

(ILD 000 714 881)

U.S. EPA REGION 5

LOSS OF INTERIM STATUS INSPECTION

REPORT-CHECKLIST

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No.	:	507
EPA Region	:	V
Site No.	:	ILD 000 714 881
Date Prepared	:	September 18, 1986
Contract No.	:	68-01-7037
PRC No.	:	15-5070-00
Prepared By	:	PRC Engineering (Daniel T. Chow)
Telephone No.	:	312/938-0300 ext. 429
EPA Primary Contact	:	William E. Muno
Telephone No.	:	312/886-4434

PRIVILEGED WORK PRODUCT PREPARED
IN ANTICIPATION OF LITIGATION

INSPECTION CHECKLIST

LOIS INSPECTIONS - REGION 5

Facility Name: Keystone Group - Bartonville Plant

Site I.D.: ILD 000 714 881

Inspection Date: April 8, 1986

Inspector(s): Edward Schuessler and Jean Desruisseaux

Completed	Not Required	Item	Page
X		General Information	B-1
	X	Summary Report	C-1
X		Notes, Other Observations, and Recommendations	D-1
X		List of Site Contacts	E-1
X		List of Site Documents	F-1
	X	List of Inspected Waste Management Units	G-1
	X	Inspection Questionnaire	H-3

GENERAL INFORMATION

Facility I.D. Number: ILD 000 714 881

Facility Name: Keystone Group - Bartonville Plant

Facility Contact (Name and Title): Dale Bennington, Manager, Enviromental Engineering

Facility Contact (Phone): 309/697-7552

Facility Mailing Address:

(Street) 7000 S. Adams Street

(City) Peoria

(State) IL (Zip) 61641

Facility Location:

(Street) 7000 S. Adams Street

(City) Peoria

(County) Peoria

(State) IL (Zip) 61641

Site ID Number ILD 000 714 881

NOTES, OTHER OBSERVATIONS AND RECOMMENDATIONS

PRC inspectors arrived at the Keystone Group - Bartonville Plant (Keystone) at 2:10 pm on April 8, 1986. Mr. Dale Bennington of Keystone told the inspectors that the U.S. EPA had filed a complaint against Keystone and that the matter currently is under litigation. Mr. Bennington called Keystone's legal counsel (Mr. Andrew Running of Kirland and Ellis, 312/861-2412) in Chicago. He then told the inspectors that the lawyer advised him not to answer any questions and requested the inspectors to leave. They left the facility at 2:25 pm. PRC could not complete the inspection.

Site ID Number ILD 000 714 881

LIST OF SITE CONTACTS

	Name	Title	Telephone
1.	Dale Bennington	Manager Environmental Engineering	309/697-7552
2.			
3.			
4.			
5.			
6.			
7.			

Site ID Number ILD 000 714 881

LIST OF SITE DOCUMENTS

1. Title Part A Application Forms 1 & 3

   Author Nicholas R. Owens, Keystone

   Date November 14, 1980 Number of Pages 10

2. Title Letter to U.S. EPA Region 5, Re: submittal of Certification Regarding Potential Releases from Solid Management Units

   Author Michael Dolan, Keystone

   Date August 21, 1985 Number of Pages 1

3. Title Letter To: Dale Bennington, Keystone, Re: Approval of Part A application withdrawal

   Author Karl Klepitsch, U.S. EPA Region 5

   Date February 15, 1983 Number of Pages 1

4. Title Letter To: David Homer U.S. EPA Region 5, Re: Hazardous Waste Management Practice

   Author Dale Bennington, Keystone

   Date October 11, 1982 Number of Pages 1

5. Title _____

   Author _____

   Date _____ Number of Pages _____

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Site ID Number ILD 000 714 881
Document No. 1

FORM 1 GENERAL — EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

ILD000714881

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

[redacted]

KEYSTONE GROUP - BARTONVILLE PLANT
7000 S. ADAMS ST.
PEORIA, IL 61641

7000 S. Adams St.
Peoria, IL 61641

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTAC
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: KEYSTONE GROUP - BARTONVILLE PLANT

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 BENNINGTON DALE MGR. ENVR. ENGR.	309 697 7552

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 7000 SOUTH ADAMS STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 PEORIA	IL	61641

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 7000 SOUTH ADAMS STREET

B. COUNTY NAME: PEORIA

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 PEORIA	IL	61641	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3312 (specify) Hot rolled iron and steel products	3315 (specify) Cold drawn carbon steel wire.

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

KEYSTONE GROUP - BARTONVILLE PLANT

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE

P (specify)

D. PHONE (area code & no.) A 309 697 7020

E. STREET OR P.O. BOX

7000 SOUTH ADAMS STREET

F. CITY OR TOWN

PEORIA

G. STATE IL

H. ZIP CODE 61641

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N ILO002526	P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
U	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturing of iron and steel including semi-finished and finished wire products.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Nicholas R. Owens Vice President of Manufacturing Keystone Group	Nicholas R. Owens	11-14-80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

EPA I.D. F I L D 000714881 T/A 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	6 8	0 1	0 1

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5	T 0 2	20,000 (for K063)	U	
X-2	T 0 3	20	E		6	D 8 3	36,500,000 (for K063)	G	
	S 0 3	300,000 (for K061)	Y		7				
2	D 8 0	180 (for K061)	A		8				
3	T 0 4	20,000 (for K062)	U		9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

CODE "T04": Keystone generates approximately 10,000 gallons/day of waste pickle liquor (K062). The K062 waste mixed with all other plant waste streams is pumped to the Waste Water Treatment Plant (WWTP). The WWTP has a design capacity of approximately twice (20,000 gal./day) that which is used. The acidic waste water is pre-neutralized to raise the pH to 5 or greater. This waste water is then lime neutralized and the solids precipitate out in the sedimentation basins. The sludge (K063) is pumped to our sludge storage lagoons.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

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EPA I.D. NUMBER (enter from page 1): ILD000714881

FOR OFFICIAL USE ONLY: W | DUP | 2 | DUP

I. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K061	10,000	T	S03 D80	
2	K062	15,000	T	T04	lime neutralization & precipitati
3	K063	15,000	T	T02 D83	
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. F I L D 0 0 0 7 1 4 8 8 1 — T/A C 6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
40 38 00	89 38 50

VIII. FACILITY OWNER

[XX] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E Keystone Consolidated Industries, Inc. Keystone Group, A Division of	309-697-7020

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 7000 South Adams	G Peoria	IL	61641

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Nicholas R. Owens Keystone Group-V.P. of Manufacturing	Nicholas R. Owens	11-14-80

X. OPERATOR CERTIFICATION

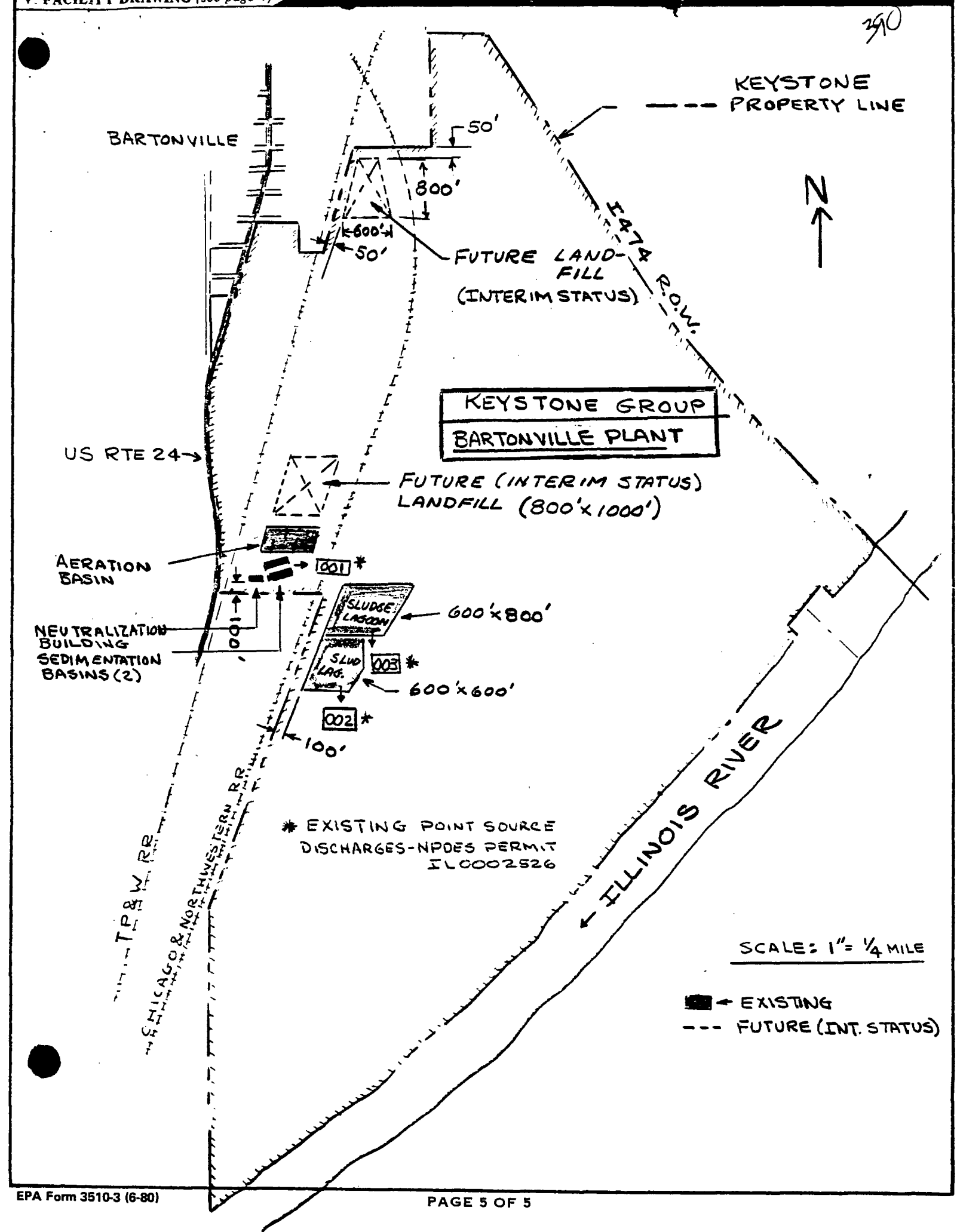
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

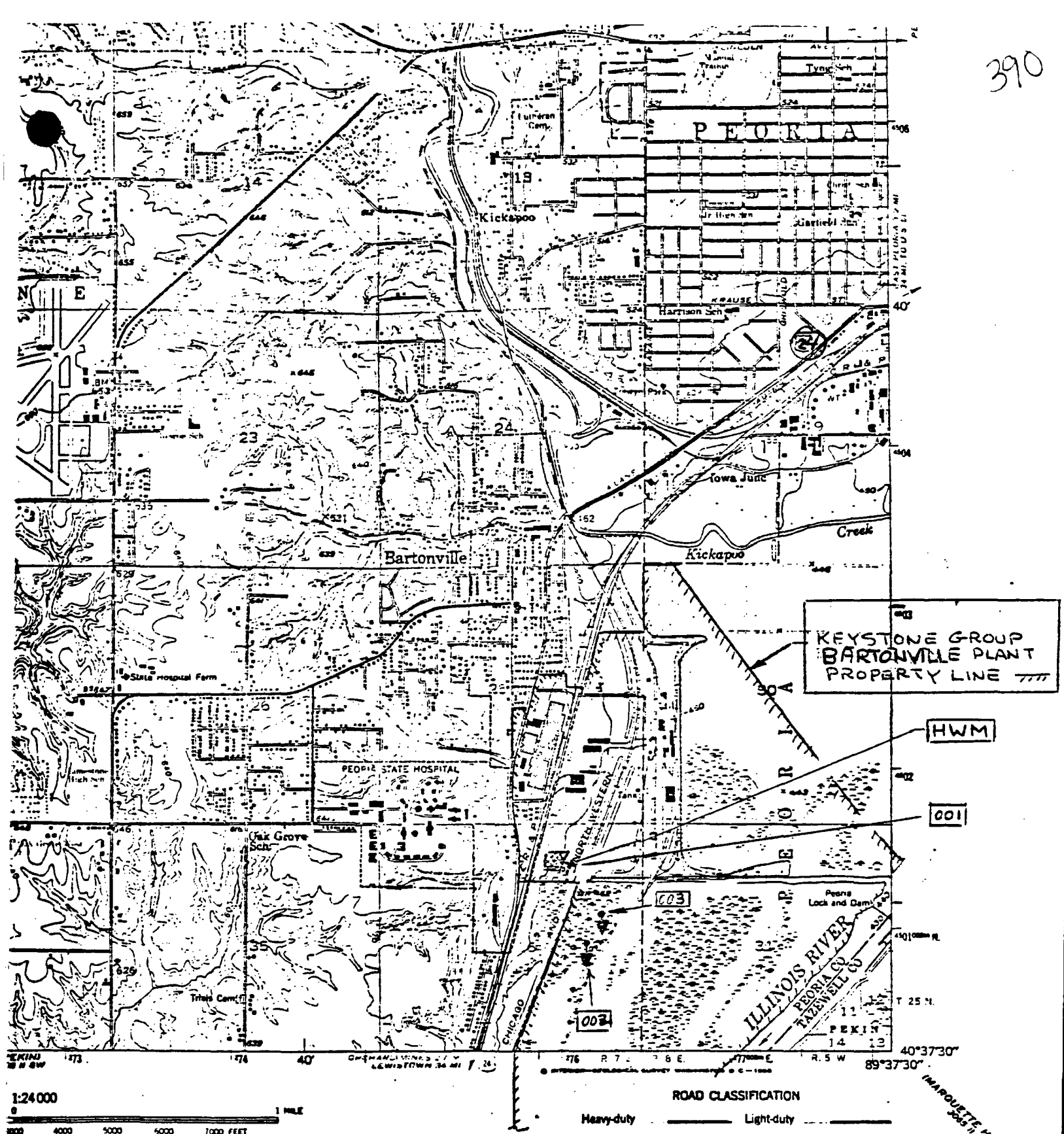
Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*

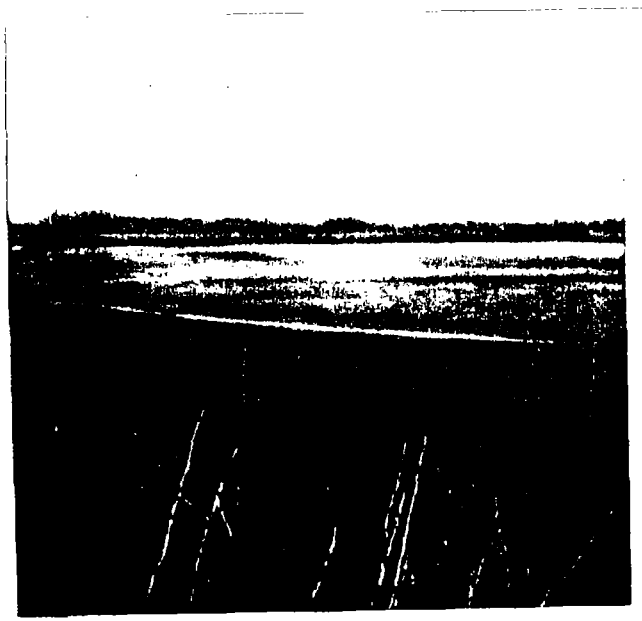
390

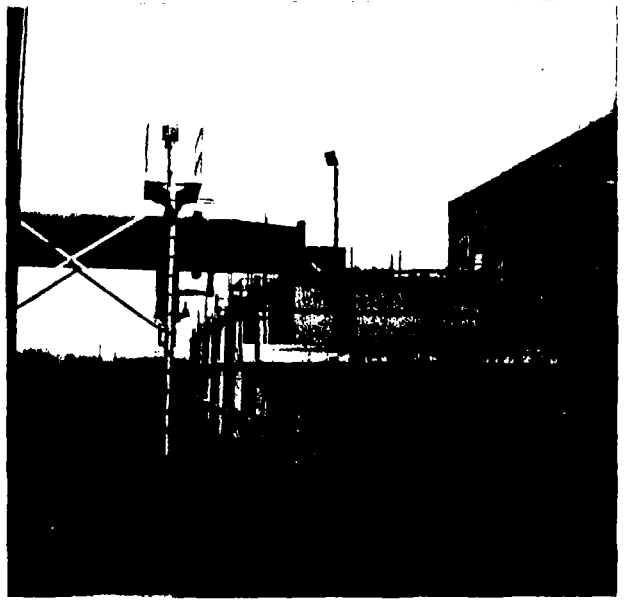


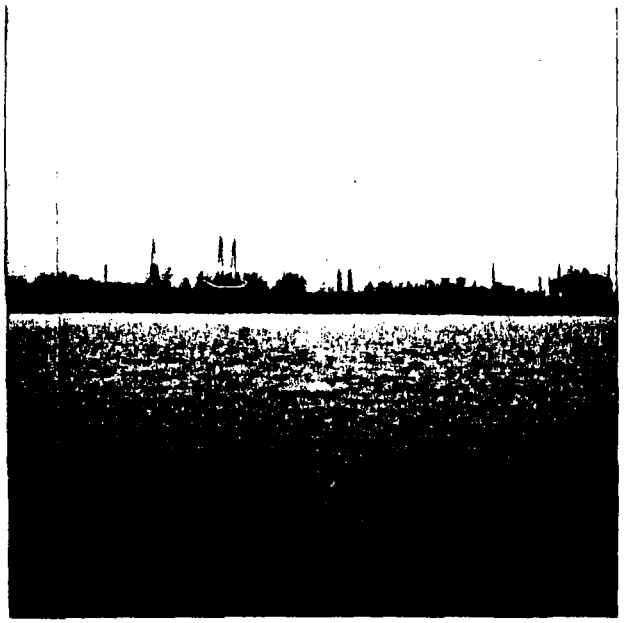
390

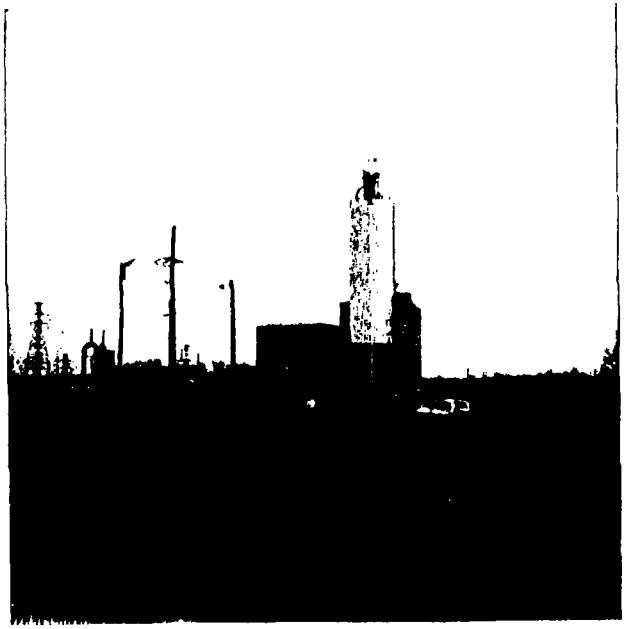


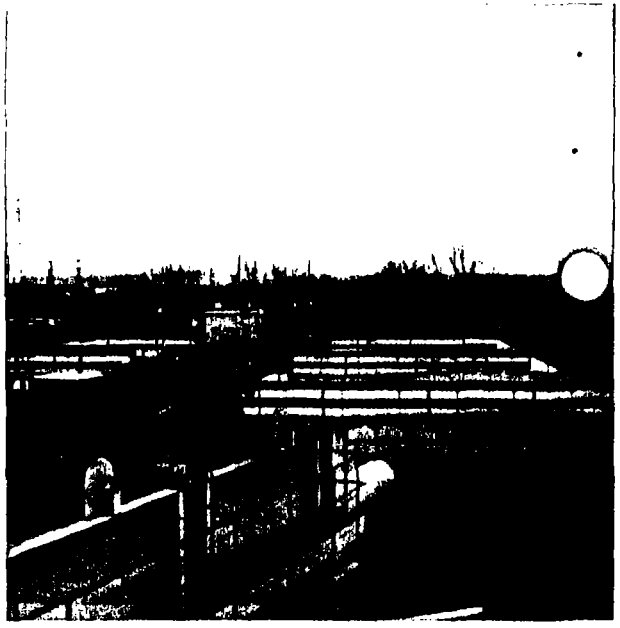
LOCATION MAP
KEYSTONE GROUP - BARTONVILLE PLT

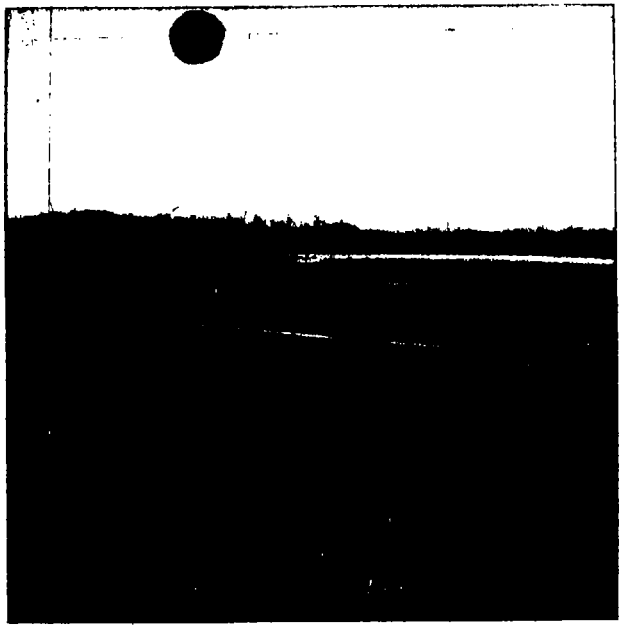








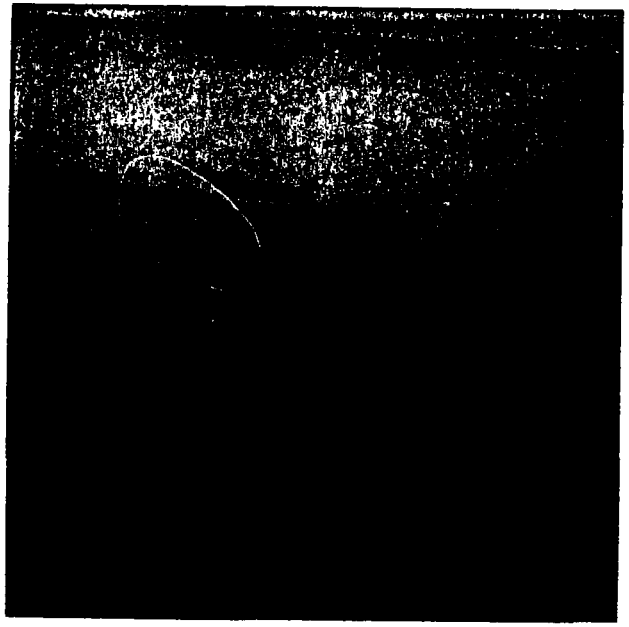




NORTH SLUDGE LAGOON
BARTONVILLE WWTP
LOOKING EAST

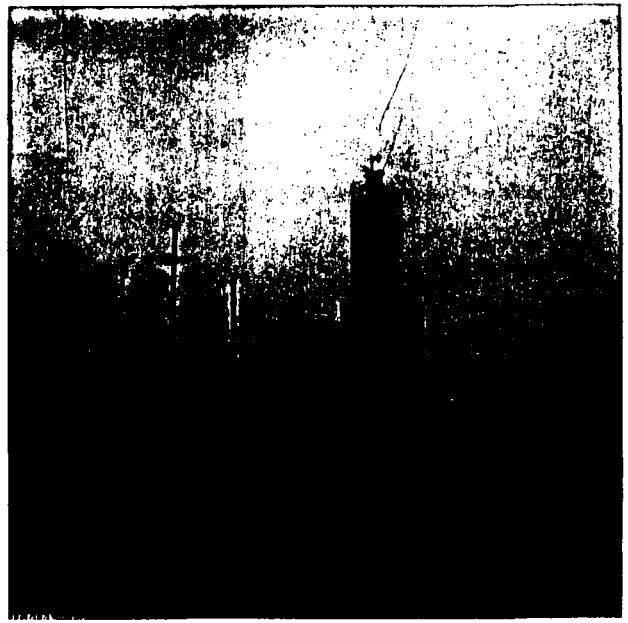
NEUTRALIZATION TANK
BARTONVILLE WWTP
LOOKING EAST

11-14-80



SOUTH SLUDGE LAGOON
BARTONVILLE WWTP
LOOKING NORTH

11-14-80



BARTONVILLE WWTP BLDG
LOOKING EAST

11-14-80

SEDIMENTATION BASINS
BARTONVILLE WWTP
LOOKING EAST

Site ID Number ILD 000 714 881
Document No. 2

SEYFARTH, SHAW, FAIRWEATHER & GERALDSON
55 EAST MONROE STREET
CHICAGO, ILLINOIS 60603
AREA CODE 312 346-8000
CABLE ADDRESS INTERLEX
WRITER'S DIRECT DIAL (312) 269-8921

LOS ANGELES OFFICE
2029 CENTURY PARK EAST
LOS ANGELES, CALIF 90067
AREA CODE 213 277-7200

NEW YORK OFFICE
520 MADISON AVENUE
NEW YORK, NEW YORK 10022
AREA CODE 212 715-9000

WASHINGTON, D.C. OFFICE
[illegible] 97TH STREET, N.W.
WASHINGTON, D.C. 20036
AREA CODE 202 463-2400

SAN FRANCISCO OFFICE
44 MONTGOMERY STREET
SAN FRANCISCO, CALIFORNIA 94104
AREA CODE 415 397-2823

August 21, 1985

Ms.Lily Herskovits
Chemical Engineer/Permit Writer
Technical Program Section
5HS-12
United States Environmetal Protection
Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Corrective Action Requirements,
Hazardous and Solid Waste Amendments
of 1984, Keystone Group - Bartonville Plant
ILD 000714881

Dear Ms. Hirskovits:

This will confirm our August 21, 1985 telephone conversation in which we discussed Ms. Ardiente's July 31, 1985 letter requesting submission of the form entitled "Certification Regarding Potential Releases from Solid Management Units". As I explained to you, the Company has scheduled a meeting with Mr. Rittenhouse and Mr. Mednick of the Agency regarding matters related to the Company's operation which should obviate the need for submission of the requested information. Given this fact and your desire to participate in such discussions, we agreed that the Company will have an additional thirty days to prepare its formal Reply to Ms. Ardiente's letter.

Very truly yours,

SEYFARTH, SHAW, FAIRWEATHER & GERALDSON

By

Michael F. Dolan

MFD/Ds
cc: Ms. Ardiente

Site ID Number ILD 000 714 881
Document No. 3

FEB 15 1983

Dale L. Pennington, Manager
Energy and Environmental Engineering
Keystone Group - Bartonville Plant
7000 South West Adams
Peoria, Illinois 61641

RE: Withdrawal of Part A (Wastewater Treatment Unit and Storage Fewer Than 90 Days)
FACILITY NAME: Keystone Group - Bartonville Plant
U.S. EPA ID NO.: ILD000714881

Dear Mr. Pennington:

This is to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of January 28, 1982, and October 11, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility has a wastewater treatment unit as defined in the 40 CFR Part 260.10 and has accumulated wastes generated on site for fewer than 90 days in containers or tanks since November 19, 1980, in accordance with 40 CFR Part 262.34. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must ensure that your waste is handled in accordance with 40 CFR Part 262.34 (enclosed), and applicable State and local requirements.

You will retain your U.S. EPA Identification number since you notified as a generator of a hazardous waste.

Please contact the Technical, Permits, and Compliance Section at (312) 353-2107 for assistance, if you have any questions. Please refer to "Withdrawal of Part A (Wastewater Treatment Unit and Storage Fewer Than 90 Days)", in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure	TYPIST	AUTHOR	PEU CHIEF	STU #1 CHIEF	STU #2 CHIEF	[illegible]	[illegible] CHIEF	AHMD DIRECTOR
cc: INITIALS	R. Owens,	Vice President					KJK	
DATE	Illinois Environmental Protection Agency						2/15/83	

WMD:WMB:D.HOMER:MO:2-11-83

Site ID Number ILD 000 714 881
Document No. 4

Keystone Steel&Wire

RECEIVED

WASTE MANAGEMENT BRANCH
EPA, REGION V

October 11, 1982

Mr. David Homer
Waste Management Branch - Region V
United States Environmental Protection Agency
111 West Jackson Blvd.
Chicago, IL 60604

RE: 5HW-TUB, RCRA Activities, I.D. # ILD 000714881 G, T, TSD, PA

Dear Mr. Homer:

This letter is in response to our phone conversation of October 7, when you requested additional information regarding our K061 (electric furnace emission control dust) waste. This was in regard to our June 28, 1982 letter withdrawing our Part A - Hazardous Waste Treatment, Storage, & Disposal (TSD) Permit Application dated 11/4/80 with interim status approval on 4/14/82.

As you suggested, Keystone has carefully reviewed its hazardous waste activities and associated regulations including the recent July 26, 1982 40CFR Part 122,260,264 & 265 regulations regarding TSD facilities. We have concluded that we remain only a generator of hazardous waste and do not require a TSD permit. Peoria Disposal, our waste hauler and disposal facility operator, intends to comply with the new regulations regarding the TSD requirements. The dust is collected daily by Peoria Disposal in trucks attached directly to the baghouse. Keystone has not experienced any problems with Peoria Disposal handling our hazardous waste.

Keystone originally applied for a TSD permit for a K061 waste mainly due to the USEPA recommendation that all generators do so in case they couldn't dispose of their waste. Peoria Disposal has been contacted and they intend to remain a fully licensed hazardous waste hauler and disposal facility.

For all of the above reasons, Keystone does not need a TSD Permit and we again consider it withdrawn.

If you need additional information, please call me direct (309) 697-7552.

Very truly yours,

DALE L. BENNINGTON, MANAGER
ENERGY & ENVIRONMENTAL ENGINEERING

RECEIVED 10/19/82

DLB:bmk
cc: J. G. Ring
L. W. Phillips
IEPA-RCRA Activities

7000 South West Adams
Peoria, IL 61641
(309) 697-7020
Subsidiary of Keystone Consolidated Industries, Inc.

nonresponsive

nonresponsive

nonresponsive

nonresponsive

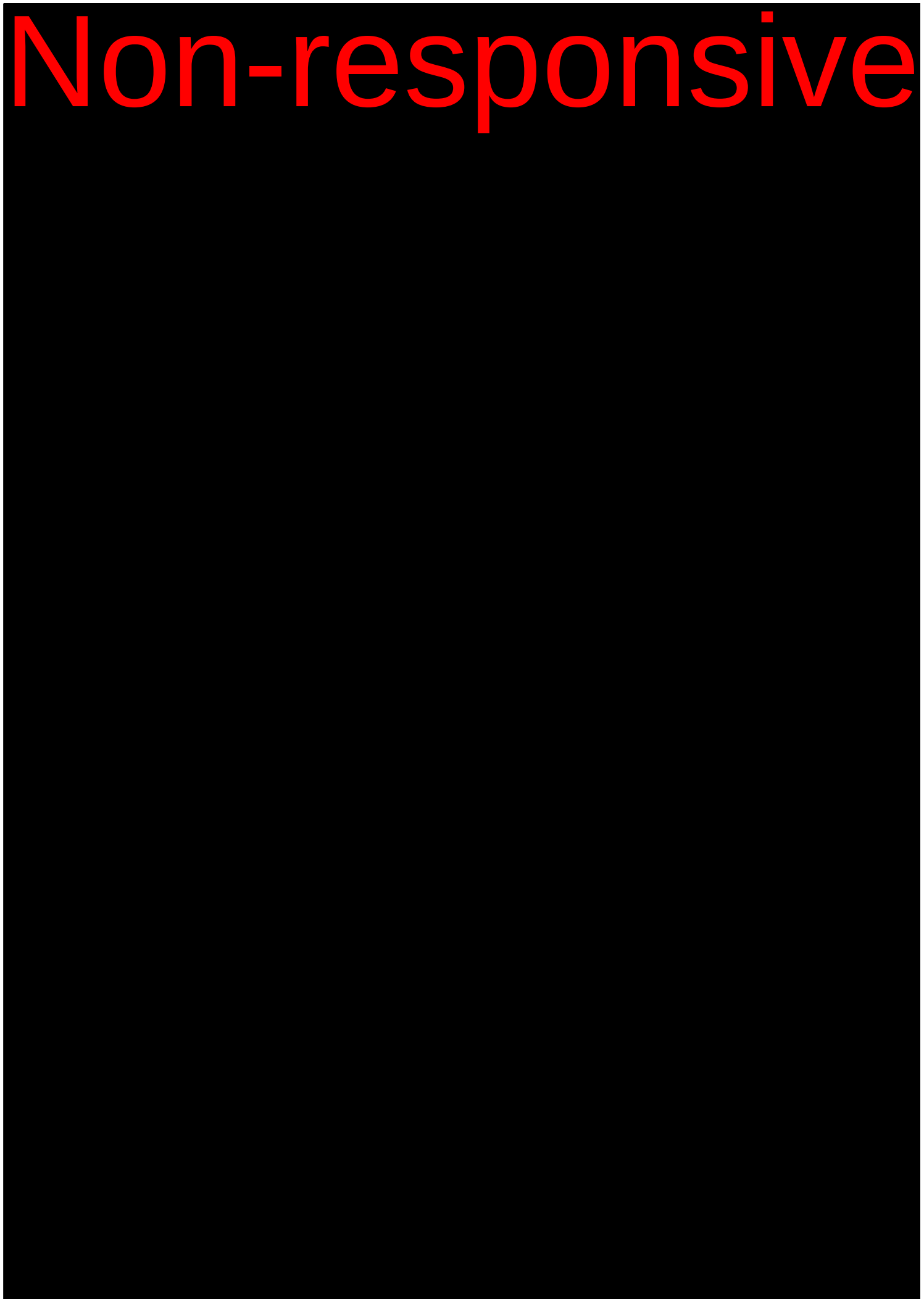
nonresponsive

nonresponsive

nonresponsive

nonresponsive

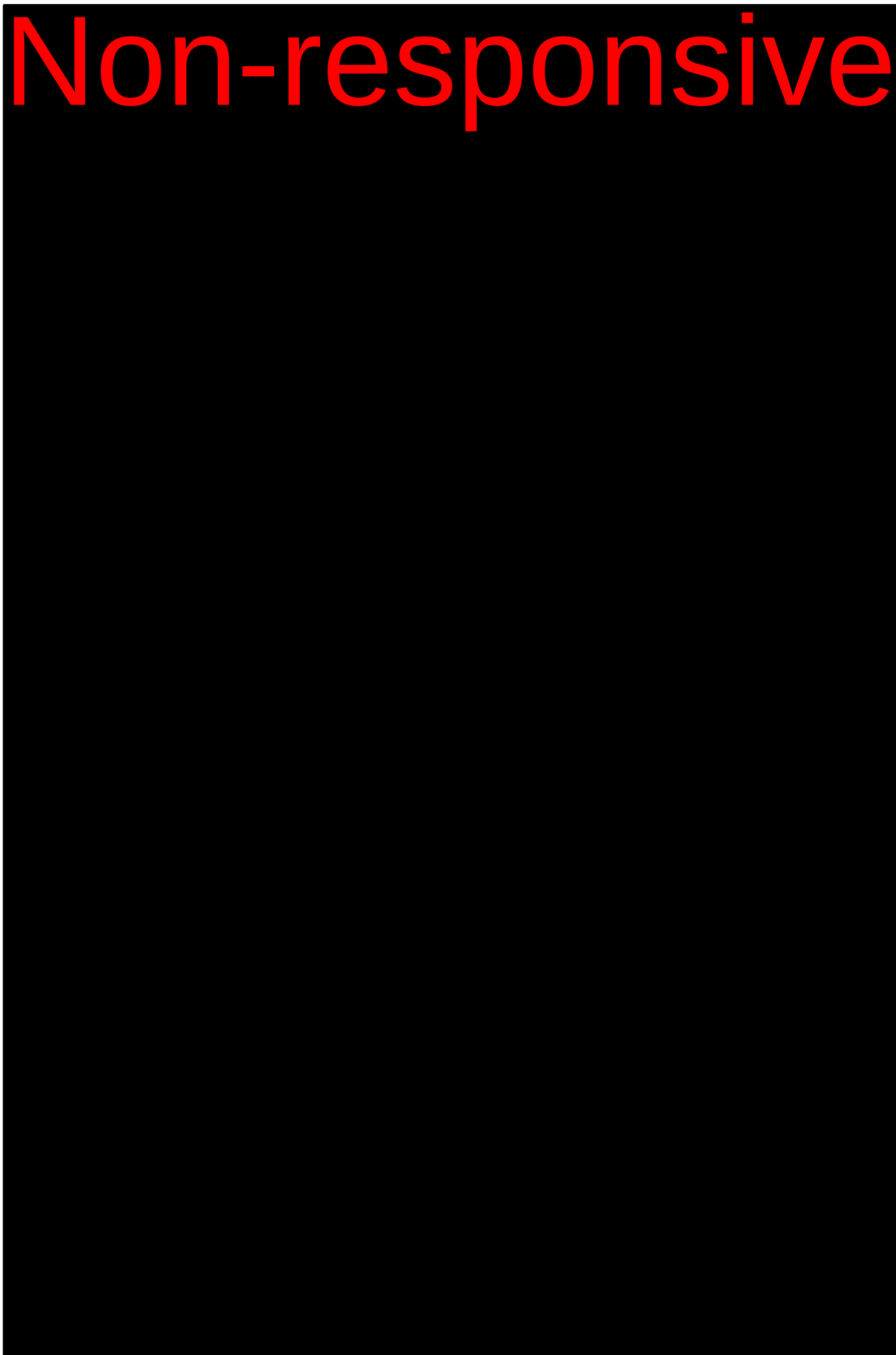
nonresponsive


Non-responsive

Non-responsive

Non-responsive

Permit History


Non-responsive

PENALTY COMPUTATION WORKSHEET

COMPANY NAME: Keystone Steel and Wire Company, Peoria, Illinois

REGULATION VIOLATED: Section 3004(g)(5) and (m); 40 CFR 268.33 "First Third" land ban and Section 3004(j); 40 CFR 268.50

Assessments for each violation should be determined on separate worksheets and totalled.

Part 1 - SERIOUSNESS OF VIOLATION PENALTY

1. Potential for Harm: Major

2. Extent of Deviation: Major

3. Matrix Cell Range: $25,000 to 20,000

   Penalty Amount Chosen: $22,500

   Justification for Penalty Amount Chosen: Midpoint of range

4. Per-Day Assessment: _____

PART II - PENALTY ADJUSTMENT

	Percentage*	Dollar Amount
1. Good faith efforts to comply/lack or good faith:	_____	_____
2. Degree of willfulness and/or negligence:	_____	_____
3. History of Noncompliance:	_____	_____
4. Other Unique Factors:	_____	_____

5. Justification for adjustment: NA

6. Adjusted Per-Day Penalty (Line 4, Part 1 + Lines 1-4, Part II): _____

7. Number of Days of Violation: _____

8. Multi-day Penalty (Number of days X Line 6, Part II): _____

9. Economic Benefit of Noncompliance: -0-

   Justification: NA

10. Total (Lines 8 + 9, Part II): _____

11. Ability to Pay Adjustment: -0-

    Justification for Adjustment: NA

12. Total Penalty Amount (must not exceed $25,000 per day of violation) $22,500

* PERCENTAGE ADJUSTMENTS ARE APPLIED TO THE DOLLAR AMOUNT CALCULATED ON LINE 4, PART I.

RCRA PENALITY COMPUTATION - JUSTIFICATION

REGULATION(S) VIOLATED: 35 IAC 703.151 (40 CFR 270.10(a)-(f))

POTENTIAL FOR HARM CATEGORY: ---Major---

Keystone has been accumulating waste emission control dust (K061) in an unauthorized waste pile without the required permit or interim status since 8/19/88. This activity is in direct conflict with the regulatory purposes of the RCRA permit program and creates a major potential for harm to human health and the environment.

EXTENT OF DEVIATION CATEGORY: ---Major---

This activity is a direct violation of the RCRA permit requirements and as such is a major deviation from the regulatory requirements for compliance.

RCRA PENALTY COMPUTATION - JUSTIFICATION

REGULATION(S) VIOLATED: Sections 3004(g)(5) and (m); 40 CFR 268.33 "First Third" land ban and Section 3004(j); 40 CFR 268.50

POTENTIAL FOR HARM CATEGORY:----Major----

Keystone has been accumulating waste emission control dust (K061) in an on-site waste pile since 8/19/88. Land disposal of K061 waste after 2/22/89 is prohibited unless it meets treatment standards. These standards have been chosen for achievement of a reduction of toxicity and mobility to protect human health and the environment. K061 is a listed hazardous waste that contains contaminants which can pollute soils and groundwater. Keystone's K061 waste pile exceeds the applicable standards and as such is creating a major potential for harm to human health and the environment, and to the regulatory program.

EXTENT OF DEVIATION CATEGORY: ----Major---

Keystone's storage of K061 in an on-site waste pile after 2/22/89 is a direct violation of the RCRA regulatory requirement. This major deviation from the requirement puts Keystone in substantial noncompliance.

PENALTY COMPUTATION WORKSHEET

COMPANY NAME: Keystone Steel and Wire Company, Peoria, Illinois

REGULATION VIOLATED: 35 IAC 724.351 (40 CFR 264.251)

Assessments for each violation should be determined on separate worksheets and totalled.

PART I - SERIOUSNESS OF VIOLATION PENALTY

1.	Potential for Harm:	Moderate
2.	Extent of Deviation	Major
3.	Matrix Cell Range:	$10,999 to 8,000
	Penalty Amount Chosen:	$ 9,500
	Justification for Penalty Amount Chosen:	Midpoint of range
4.	Per-Day Assessment:	

PART II - PENALTY ADJUSTMENT

		Percentage*	Dollar Amount
1.	Good faith efforts to comply/lack or good faith:		
2.	Degree of willfulness and/or negligence:		
3.	History of Noncompliance:		
4.	Other Unique Factors:		
5.	Justification for adjustment: NA		
6.	Ajusted Per-Day Penalty (Line 4, Part 1 + Lines 1-4, Part II):		
7.	Number of Days of Violation:		
8.	Multi-day Penalty (Number of days X Line 6, Part II):		
9.	Economic Benefit of Noncompliance:		-0-
	Justification: NA		
10.	Total (Lines 8 + 9, Part II):		
11.	Ability to Pay Asjustment:		-0-
	Justification for Adjustment: NA		
12.	Total Penalty Amount (must not exceed $25,000 per day of violation)		$9,500

* PERCENTAGE ADJUSTMENTS ARE APPLIED TO THE DOLLAR AMOUNT CALCULATED ON LINE 4, PART I.

RCRA PENALITY COMPUTATION - JUSTIFICATION

REGULATION(S) VIOLATED: 35 IAC 724.351 (40 CFR 264.251)

POTENTIAL FOR HARM CATEGORY: ---Moderate---

At the Keystone facility a waste pile of K061 dust has been accumulating since 8/19/88. Keystone has stated that the pile is on a liner and has earthern berms. Keystone also claims there is no evidence of run-off from the pile. This waste pile has been inspected by IEPA and found to be deficient for liner and leachate collection system requirements. These deficiencies create a moderately adverse effect on the regulatory purposes of the RCRA standards.

EXTENT OF DEVIATION CATEGORY: ---Major---

Information submitted by IEPA indicates that Keystone is in direct violation of the RCRA requirements for waste pile liner and leachate collection systems. This is a major deviation from the regulatory requirements.

PENALTIES OPERATING RECORD

PENALTY COMPUTATION WORKSHEET

Company Name: Keystone Steel & Wire

Violation Violated: 35 Ill. Adm. Code 5725.173

Assessments for each violation should be determined on separate worksheets and totalled.

Part I - Seriousness of Violation Penalty

1. Potential for Harm: minor
2. Extent of Deviation: moderate
3. Matrix Cell Range: 500 - 1500

   Penalty Amount Chosen: 600

   Justification for Penalty Amount Chosen: - operating record is very incomplete. does not deal with five surface impoundments or waste piles

4. Per-Day Assessment: _____

Part II - Penalty Adjustments

	Percentage Change*	Dollar Amount
1. Good faith efforts to comply/lack of good faith:	_____	_____
2. Degree of willfulness and/or negligence:	_____	_____
3. History of Noncompliance:	_____	_____
4. Other Unique Factors:	_____	_____
5. Justification for Adjustments:		
6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II):		_____
7. Number of Days of Violation:		_____
8. Multi-day Penalty (Number of days X Line 6, Part II):		_____
9. Economic Benefit of Noncompliance:		_____
Justification:		
10. Total (Lines 8 + 9, Part II):		600
11. Ability to Pay Adjustment:		
Justification for Adjustment:		_____
12. Total Penalty Amount (must not exceed $25,000 per day of violation):		_____

* Percentage adjustments are applied to the dollar amount calculated on Line 4, Part I.

FACILITY STANDARDS

PENALTY COMPUTATION WORKSHEET

[redacted]pany Name: Keystone Steel & Wire

[redacted]ulation Violated: 35 Ill. Adm. Code 3725, Subpart B

Assessments for each violation should be determined on separate worksheets and totalled.

Part I - Seriousness of Violation Penalty

1. Potential for Harm: minor
2. Extent of Deviation: moderate
3. Matrix Cell Range: 500 - 1500

   Penalty Amount Chosen: 1500

   Justification for Penalty Amount Chosen: - numerous areas not dealt with in spec; training gaps, inspection of facility only partial, poor security on impoundments, no regular waste-sampling program.

4. Per-Day Assessment:

Part II - Penalty Adjustments

	Percentage Change *	Dollar Amount
1. Good faith efforts to comply/lack of good faith:		
2. Degree of willfulness and/or negligence:		
3. History of Noncompliance:		
4. Other Unique Factors:		

5. Justification for Adjustments:

6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II):
7. Number of Days of Violation:
8. Multi-day Penalty (Number of days X Line 6, Part II):
9. Economic Benefit of Noncompliance:

   Justification:

10. Total (Lines 8 + 9, Part II): 1500
11. Ability to Pay Adjustment:

    Justification for Adjustment:

12. Total Penalty Amount (must not exceed $25,000 per day of violation):

* Percentage adjustments are applied to the dollar amount calculated on Line 4, Part I.

Non-responsive

file copy

Non-responsive

Environmental Concern Rating

	HIGH	LOW	N/A
1. Rate concern relative to the CERCLA Program, and discuss -(National Priority List sites should automatically be high concern; significant past handlers of CERCLA cleanup wastes should automatically be high concern; facilities that have absolutely no 'CERCLA connection' should be rated N/A)	☒	☐	☐
2. Rate concern relative to status as a commercial handler, and discuss -- (facilities that handle significant amounts of waste from a variety of sources should be rated high; (facilities that handle only their own company's off-site waste could be rated low; facilities that only handle on-site generated wastes should be rated N/A)	☐	☒	☐
3. Rate concern relative to facility's financial condition (facilities which have or are expected to declare financial insolvency should be rated high)	☒	☐	

RATING DISCUSSION: facility managed a K061 landfill from 1970-1976, prior to RCRA (see attached CERCLA Notification) — closure was monitored by IEPA and permitted by Army Corp. of EGRS.; GW Monitoring of landfill was concluded in 12/7/81. However, questions exist regarding prior management of other hazardous wastes generated on-site, ie: K062 waste prior to operation of Trmt. Plant in 1969 and F002 listed wastes.

RATING DISCUSSION: facility manages their own wastes generated from on-site industrial processes (see below *)

RATING DISCUSSION: Steel industry is currently a financially unstable business

* 2. Wastes Generated / Management Methods:

HAZ

K061 / Disposal at Peoria Disposal Co. (PDC)

K062 / Storage & Trmt. (Neutralization) including surface impoundments

*F002 / stored < 90 days, shipped off-site, (destinations which are currently permitted for acceptance at McKesson Chemical Co. for recovery - no record of material manifested there)

D001 / Disposal at PDC (Solidified Paint Waste)

Non-HAZ

Machine Shop Dust - disposal at Tazewell County Landfill

Drawing Compound; Waste Lime - disposal at PDC.

K062 Waste water Treatment Sludge - disposal on-site in surface impoundments

	Environmental Concern Rating		
	HIGH	LOW	N/A
4. Rate concern relative to facility's 40 CFR Part265 compliance status/history. (High Priority violators and Significant Non-Compliers should be rated high; for proposed facilities, rating is N/A)	☒	☐	☐
5. Based on the waste management processes employed (to be employed) at the facility, rate the concern, and discuss -- (processes subject to ground water monitoring will most often dictate a rating of high; incinerators will most often dictate a rating of high; "contained" storage/treatment such as in drums/tanks will most often rate low)	☒	☐	
6. Based on the presence, absence, significance of old Solid Waste Management Units & whether releases from old or current units are known, suspected, corrected; rate the concern, and discuss -- (known & seriously suspected releases should dictate a rating of high, unless felt to be insignificant/de minimis)	☒	☐	

RATING DISCUSSION: Currently, the facility is under enforcement action initiated by IEPA referral. As a result a Complaint; Compliance Order was issued by USEPA in June 28, 1985 (refer to Docket No. V-W-85, R-3). Major violations (cont below)

RATING DISCUSSION: the facility currently stores, treats and disposes of K062 Haz. waste in surface impoundments and waste piles for which no GW Monitoring Program exists.

RATING DISCUSSION: pre-existing units: K061 landfill closed in 1978 (see item *1); existing SWMUs: sludge disposal ponds - used to dispose of sludge generated from treatment of K062 waste. No monitoring exists for other unit - releases are questionable.

*4. cont: consist of not fully describing or including all hazardous waste activities on Part A permit application and subsequently violating related interim status standards for these activities, particularly subpart F GW Monitoring.

	Environmental Concern Rating		
	HIGH	LOW	N/A
7. Rate concern, based only on the volume and type of waste handled, and discuss -- (low volumes of extremely toxic wastes could rate a high; very heavy volumes of waste could rate a high, though wastes are not particulary dangerous)	☒	☐	
RATING DISCUSSION: manage high volumes of K062 wastes — listed for corrosivity and toxicity			
8. Rate concern relative to facility's NON-hazardous waste general environmental regulatory status/history, and discuss --	☐	☒	☐
RATING DISCUSSION: see item #2. Majority of non-haz. wastes generated consist of sludge from treatment process which is currently disposed of in on-site lagoons (approximately 10 ; 12 acres each in size). No recent analytical data confirming non-haz. status of these lagoons exist.			
9. Rate concern relative to facility's physical location(proximity to population or to sources of accidents or dangers which would tend to increase the facility's inherent danger)	☒	☐	
RATING DISCUSSION: located in Illinois River flood plain			

	Environmental Concern Rating		
	HIGH	LOW	N/A
10. Rate public concern, for whatever reason	☐	☒	
RATING DISCUSSION: _____			
11. Other	☒	☐	☐

DISCUSS: facility records reveal that this site has made every attempt in the past to claim exemption from RCRA permitting including omission of information from request to withdraw Part A, resulting in approval of the request by USEPA, based on false/inadequate information. In addition, no certification of SWMU's or of compliance w/ subparts F, G, & H has been received by this Agency, as required by the HSWA of 1984.

BASED ON ABOVE ANALYSIS, RECOMMENDATION IS THAT

KEYSTONE GROUP - BARTONVILLE PLANT

FACILITY NAME

IS ENVIRONMENTALLY SIGNIFICANT AND A FACILITY MANAGEMENT PLAN WILL BE PREPARED ☒

IS NOT, AT THIS TIME, CONSIDERED TO BE ENVIRONMENTALLY SIGNIFICANT, AND A FACILITY MANAGEMENT PLAN WILL NOT BE PREPARED ☐

SUMMARY OF FACILITY SCREENING FOR ENVIRONMENTAL SIGNIFICANCE

FACILITY NAME Keystone Group - Bartonville Plant

FACILITY ID # ILD 000714881

	Environmentally Significant YES	NO
STATE'S RECOMMENDATION OF 1/24/86 DATE	☒	☐
U.S. EPA RECOMMENDATION OF _____ DATE	☐	☐
JOINT STATE - U.S. EPA DETERMINATION	☐	☐

Discussion of resolution of issues, if any, in arriving at joint recommendation. Include date(s), location, participants at any resolution meetings.

_____

_____

_____

_____

_____

_____

_____

_____

SUMMARY OF FACILITY SCREENING FOR ENVIRONMENTAL SIGNIFICANCE

FACILITY NAME Keystone Group - Bartonville Plant

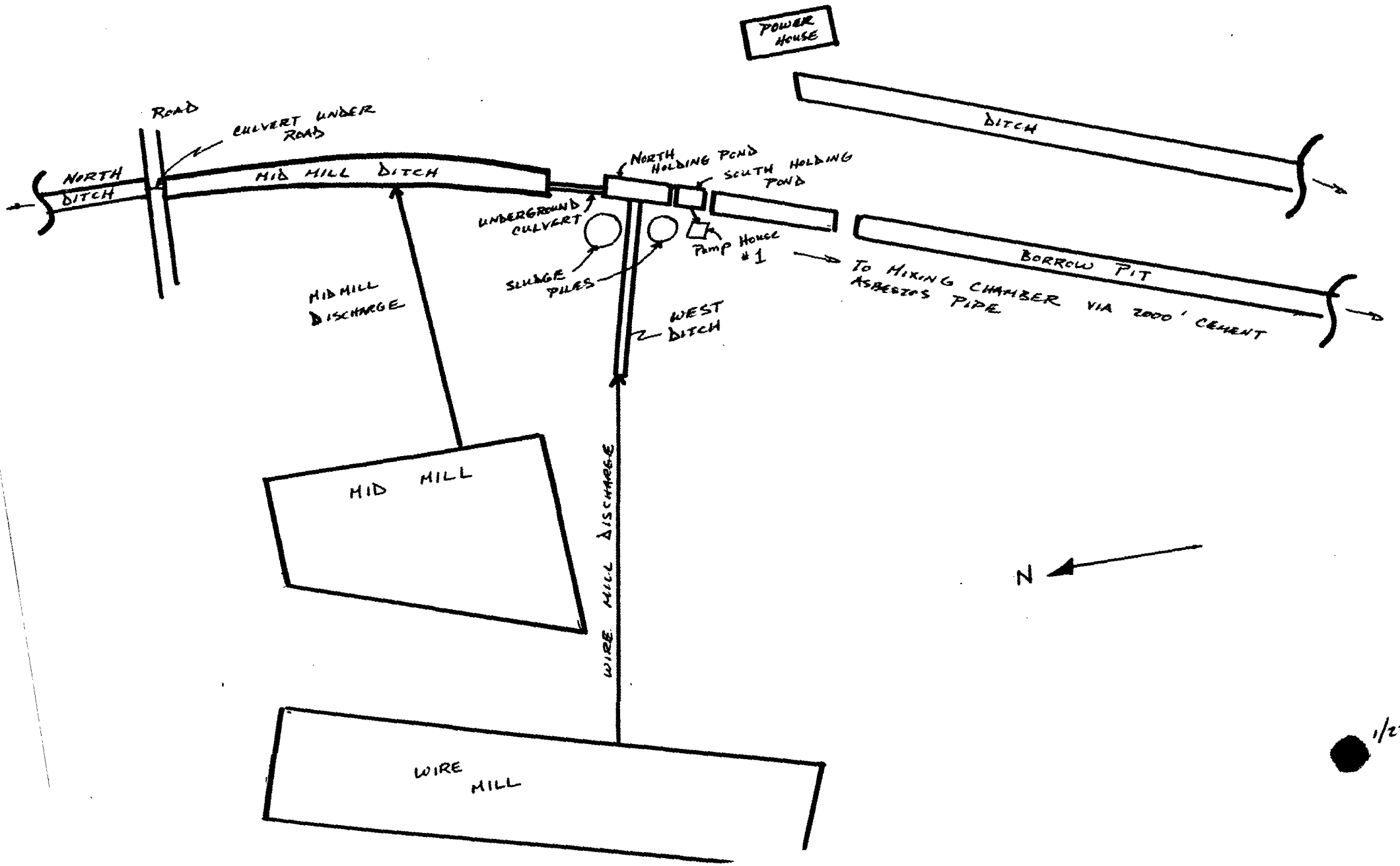
FACILITY ID # ILD 000714 881

	Environmentally Significant	
	YES	NO
STATE'S RECOMMENDATION OF 1/24/86 DATE	☒	☐
U.S. EPA RECOMMENDATION OF DATE	☐	☐
JOINT STATE - U.S. EPA DETERMINATION	☐	☐

Discussion of resolution of issues, if any, in arriving at joint recommendation. Include date(s), location, participants at any resolution meetings.

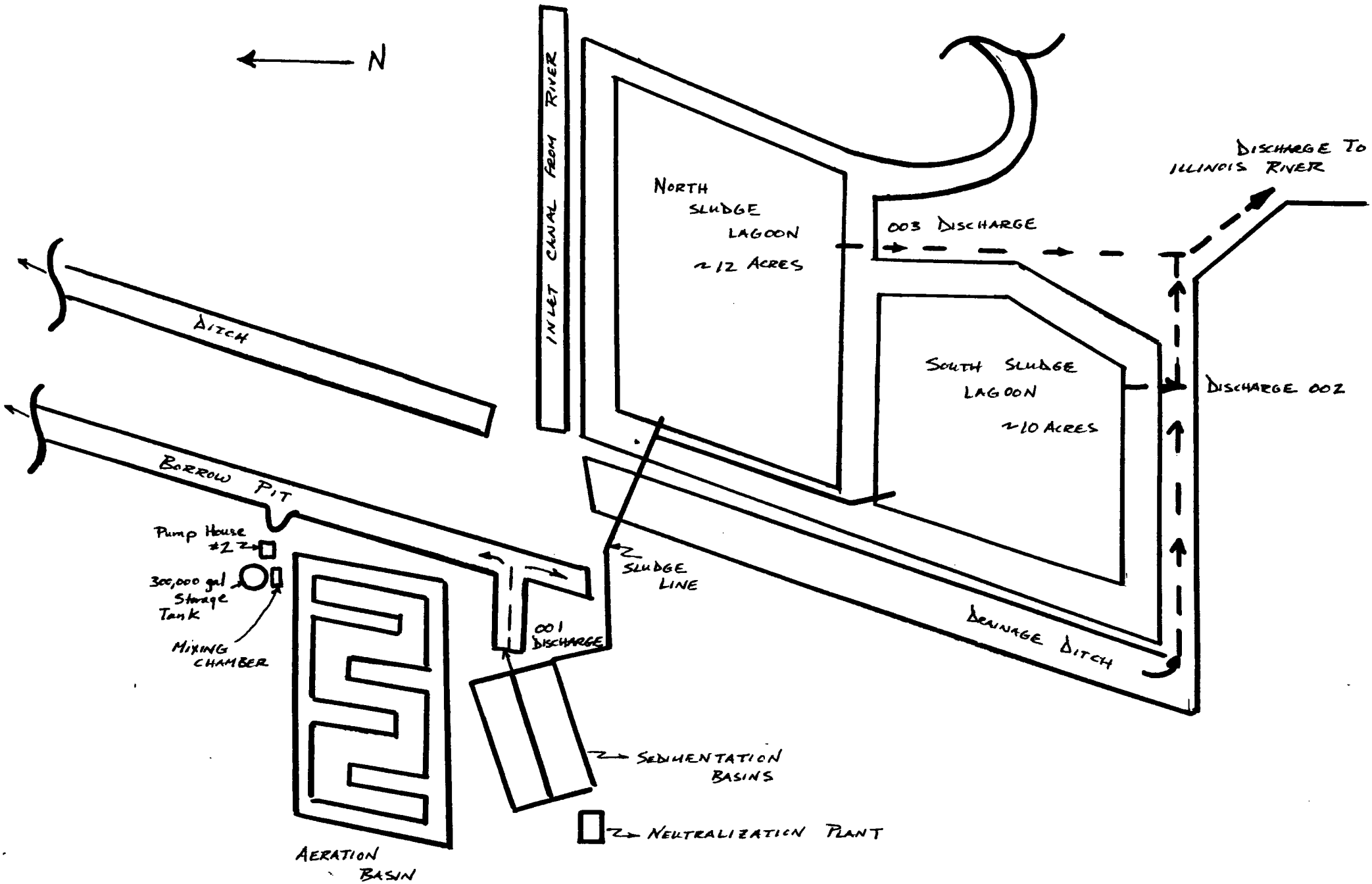
Barton
ILD 007148 81

FACILITY LAYOUT — NORTH END



1/23/86

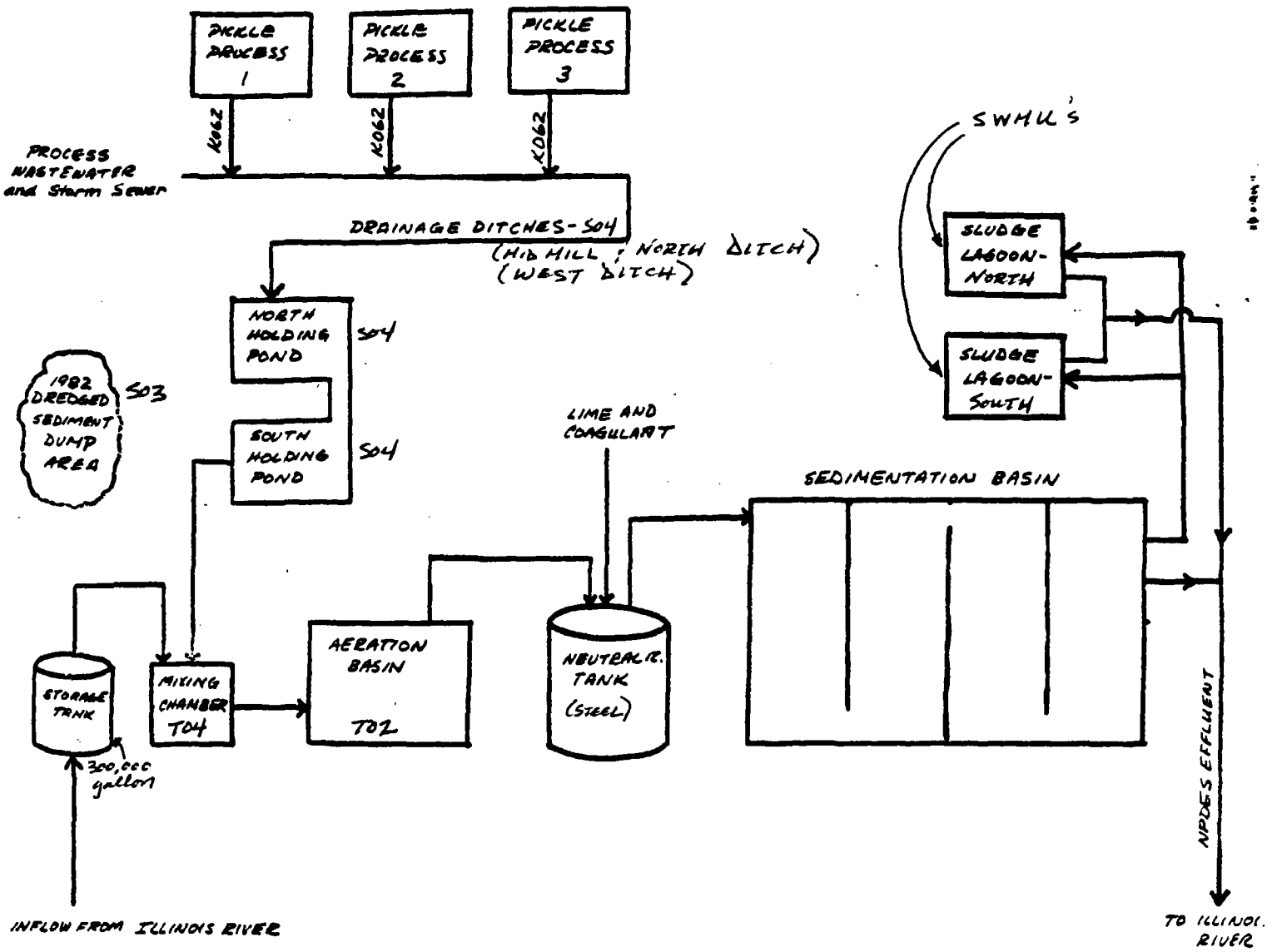
Bartonville / Keystone Steel & Wire
ILD 00714881
FACILITY LAYOUT - SOUTH END



1/23/86 JV

refer to: 1430050001 - Peoria
Bartonville / Keystone
ILD 007144881
FACILITY FLOW DIAGRAM

PROCESS FLOW
FOR K062 HAZARDOUS WASTES & IDENTIFICATION
OF RCRA REGULATED UNITS



1/23/86 JA

Keystone Group

7000 SOUTH WEST ADAMS STREET, PEORIA, IL 61641 (309) 697-7020

14300501 - Pesria Co.
Bartonville / Keystone

May 22, 1981

Regional Administrator
USEPA Region V
Sites Notification
Chicago, Illinois 60604

Dear Administrator:

Enclosed is completed USEPA From 8900-1 which is the required hazardous waste notification form for complying with The Comprehensive Environmental Response, Compensation, and Liability Act of 1980PL96-510 (Superfund).

The landfill described in the notification form has been properly closed since October 1, 1978. Quarterly monitoring of ground water has shown no release of hazardous waste to the environment.

Very truly yours,

Dale L. Bennington, PE
Manager of Environmental
Engineering

DLB/nle
Enclosure
CC: Rauf Piskin, Manager Hydrogeology Unit,
Division of Land Pollution Control,
Illinois EPA

EPA Notification of Hazardous Waste Site

COPY

United States Environmental Protection Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name: Keystone Group - Bartonville Plant

Street: 7000 S. Adams Street

City: Peoria State: IL Zip Code: 61641

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site: Peoria County Landfill #14300501

Street: 7000 S. Adams Street

City: Peoria County: Peoria State: IL Zip Code: 61641

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Bennington, Dale-Manager, Environmenta

Phone: (309) 697-7552 Engineering for Keystone Group

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1970 To (Year): 1976

E Waste Type: *Choose the option you prefer to complete*

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☒ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☒ Other (Specify) Iron & Steel Manufacturing

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

K-061		

RECEIVED
NOV 22 1983
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

RECEIVED
MAY 26 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

Form Approved
OMB No. 2000-0138
EPA Form 8900-1

Notification of Hazardous Waste Site **Side Two**

F Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☒ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☐ Other (Specify) _____

Total Facility Waste Amount

cubic feet 1,000,000

gallons _____

Total Facility Area

square feet 90,000

acres _____

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment. ☐ Known ☐ Suspected ☐ Likely ☒ None

4 Monitoring Wells Show No Releases to the Environment

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

Keystone Drawing No. 77756-Rev. 1 is attached which shows the site location, closure material and the four monitoring wells.

RECEIVED
NOV 22 1983
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

History: Keystone deposited (RCRA-K061) baghouse dust at the site from 1970-1976. The site is located in the regulatory floodplain and Keystone obtained a U.S. Army Corps of Engineers Permit #I3407802 to properly close this site. Closure by placing a clay cover over the fill was completed by October 1, 1978.

Since closure, quarterly monitoring reports from two ground water locations (G101, G102) and from two deep well (S101, S102) have been submitted to the Illinois EPA per their requirements (Illinois EPA Site Inventory #14300501. These analyses show no release of hazardous wastes to the environment.

RECEIVED
MAY 26 1981
E.P.A. — D.L.P.C.
STATE OF ILLINOIS

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name Keystone Group-Div. of Keystone Consolidated Industries

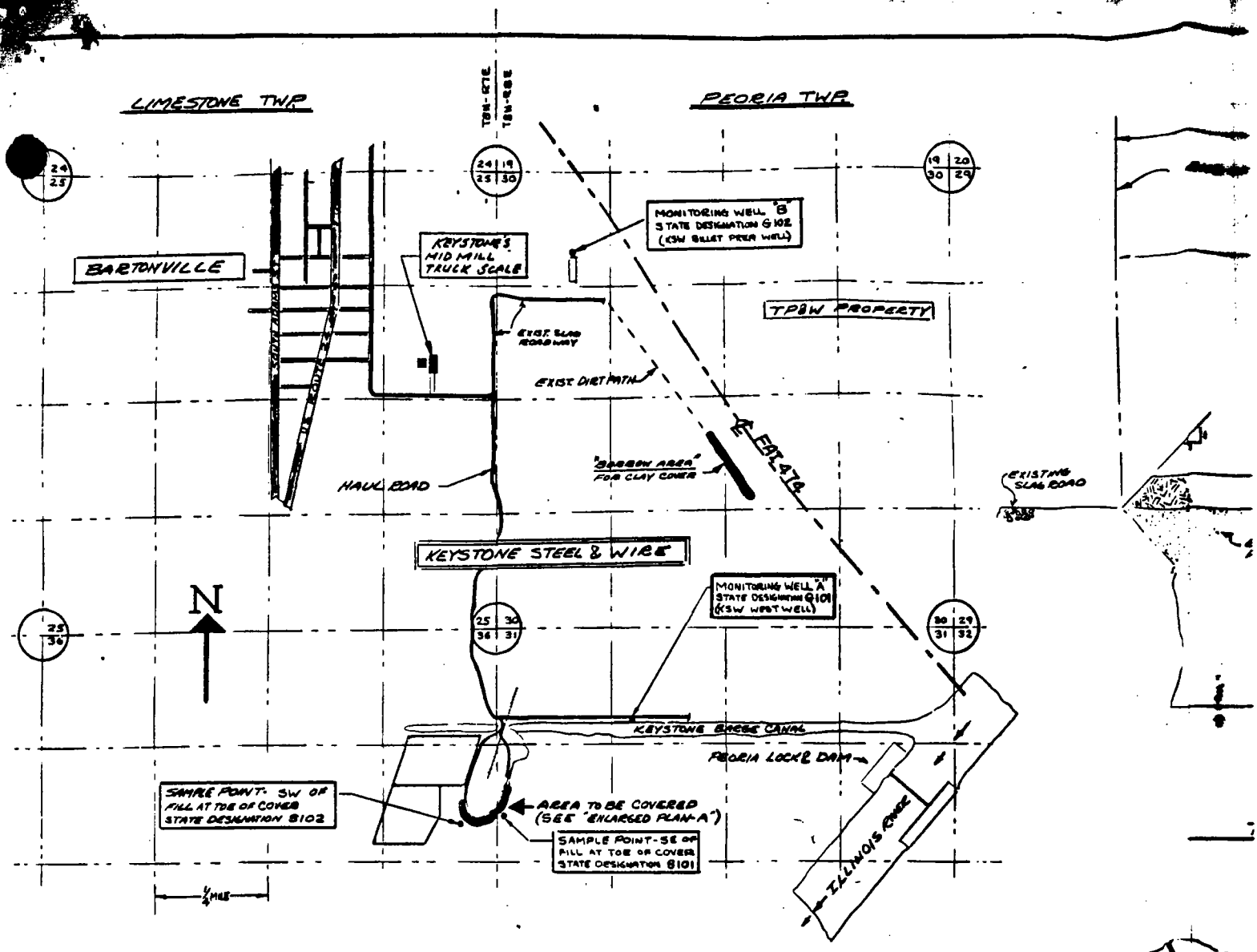
Street 7000 S. Adams Street

City Peoria State IL Zip Code 61641

Signature D L Bennington Date 5/22/81

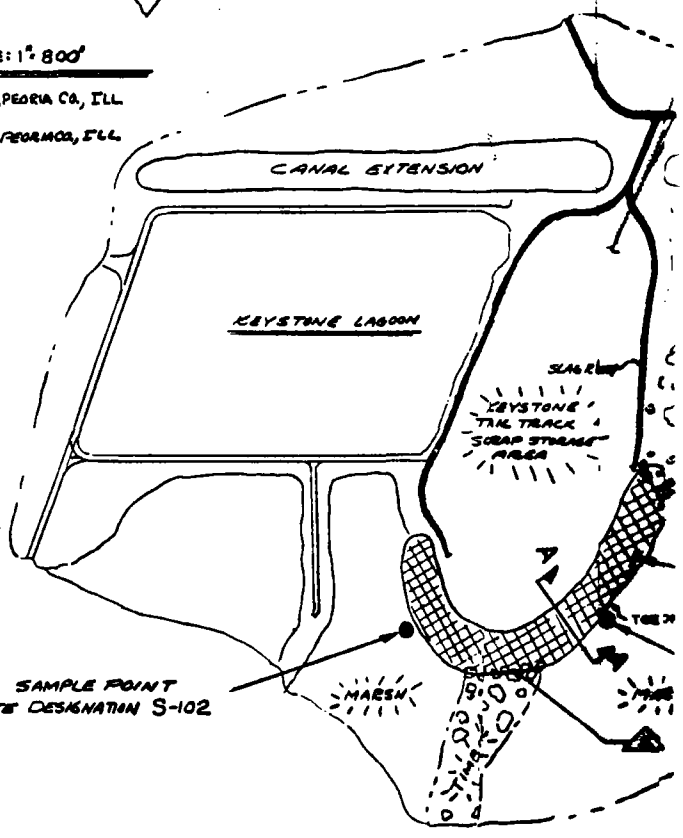
Dale L. Bennington
Manager of Environmental Engineering
Authorized Agent

☒ Owner, Present
☐ Owner, Past
☐ Transporter
☒ Operator, Present
☐ Operator, Past
☐ Other



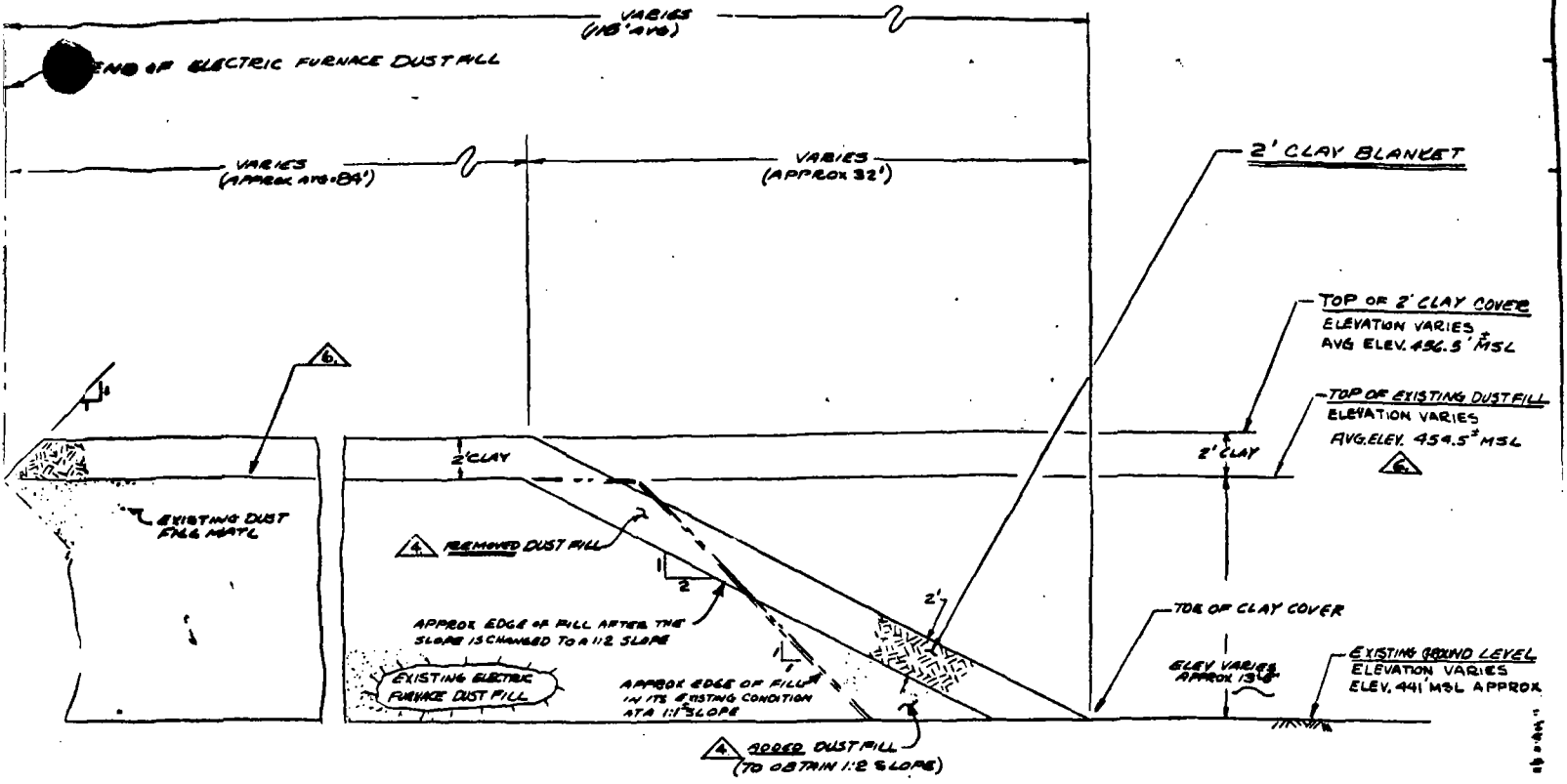
SITE PLAN - PLAT OF LANDFILL COVER LOCATION SCALE: 1" = 800'

PART OF THE SE 1/4 OF THE NE 1/4 OF SECTION 36, T.8N., R.7E. OF THE 4TH P.M., PEORIA CO., ILL.
AND
PART OF THE SW 1/4 OF THE NW 1/4 OF SECTION 31, T.8N., R.8E. OF THE 4TH P.M., PEORIA CO., ILL.



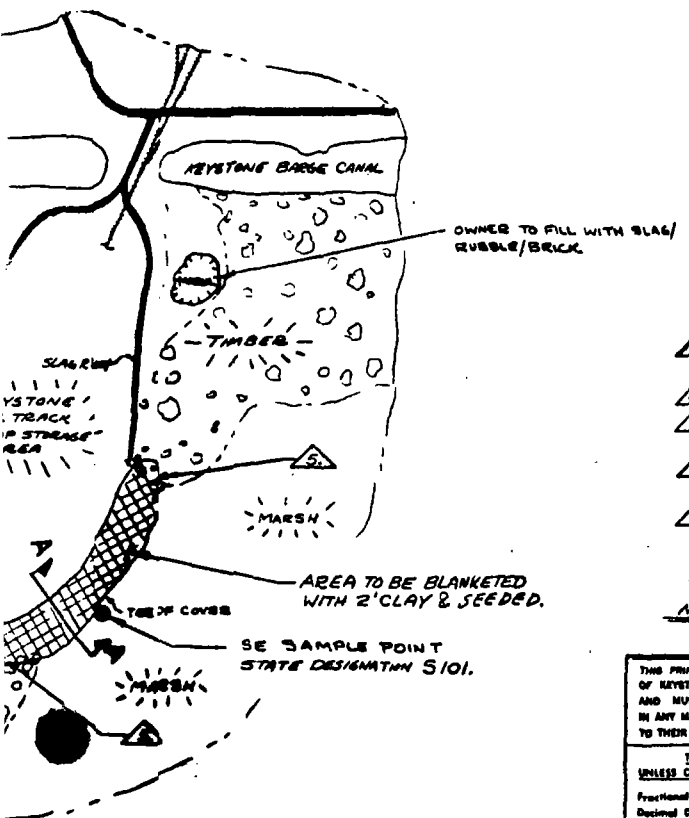
ENLARGED PLAN - DETAIL

ITEM	QTY.	PART NO.	DWG. NO.	DESCRIPTION



SECTION A-A SCALE: 1/4"=1'-0"

TYPICAL CROSS-SECTION OF THE EXISTING FILL & THE NEW CLAY BLANKET



PLAN - DETAIL "A" SCALE: 1"=200'

ESTIMATED QUANTITIES

CLAY FILL — 8,000 CUBIC YARDS

7. THIS COVER PLACED PER IEPA PERMIT #1430050I & FILED @ PEORIA CO. LAND RECORDERS OFFICE

6. CONTR. TO SMOOTH & SHAPE THE TOP SURFACE OF THE EXISTING DUST FILL BEFORE PLACING THE 2' THICK CLAY BLANKET.

5. CONTR. TO REMOVE TREES & GROWTH AS NECESSARY FOR CONSTRUCTION PURPOSES.

4. CONTR. TO RESHAPE EXISTING SLOPE TO OBTAIN A MINIMUM SLOPE OF 1:2 BEFORE CLAY BLANKET IS CONSTRUCTED.

3. THE ENTIRE CLAY BLANKETED AREA SHALL BE PREPARED, FERTILIZED, SEEDED & MULCHED ACCORDING TO SPECIFICATIONS.

2. CLAY BLANKET MATERIAL TO BE WELL COMPACTED IN 6" TO 12" LIFTS ON A MINIMUM SLOPE OF 1:2. CONTR. TO USE OWNER'S CLAY MATL. AVAILABLE ON OWNERS PROP. CONTR. TO LOAD, HAUL, PLACE & COMPACT.

1. ALL ELEVATIONS ARE MEAN SEA LEVEL - MSL.

NOTES:

NOTE: REPORT ALL ALTERATIONS TO ENGINEERING DEPT.

TOLERANCES UNLESS OTHERWISE SPECIFIED

Fractional Dim.	± 1/64
Decimal Dim.	± .005
Angular Dim.	± 1°

BREAK SHARP CORNERS AND REMOVE ALL BURRS.

RETURN THIS PRINT UPON COMPLETION OF JOB.

REV.	DATE	BY	DESCRIPTION OF CHANGE
0	8-3-78	DC	MADE NECESSARY
			REVISIONS TO REFLECT 6" SLAG
			COVER WITH SEEDING.
	10-19	268	ADDED NOTE 7

REFERENCE DRAWGS. SERIAL NO.

KEYSTONE STEEL AND WIRE - PEORIA, ILL. 61641
DIV OF KEYSTONE CONSOLIDATED INDUSTRIES, INC
ENGINEERING DEPARTMENT

DEPT. STEEL WORKS GENERAL

CLASS ARC SHOP DUST DISPOSAL

NAME TAIL TRACK LANDFILL COVER INSTALLATION

DR. DLB	TR.	CK.	OK
JOB # 36473			
DATE			

SCALE	DIV	DSN	DRAWING NUMBER
NOTED	4-20-78	100	77756

Non-responsive

Na
Da

1.

2.

3.

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6.

7.

Non-responsive

NFIDENTIAL

8. Identificat
Dispose

t or reference
wastes is
ase, to complete
reatest interest

Non-responsiveve

responsive

Type of Wast

Part A er
of hazard
disposed

9. Review of
*No respo

10. If the res
than chec

X

responsive

Non-responsive

Non-responsive

Non-responsive

Non-responsive

e) If

of
by
f) If

g) If

h) If

se print or type in the unshaded areas only
—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

ILD000714881

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B, which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

III. FACILITY MAILING ADDRESS

KEYSTONE GROUP - BARTONVILLE PLANT
7000 S. ADAMS ST.
PEORIA, IL 61641

ATTACHMENT 19-A

IV. FACILITY LOCATION

7000 S. Adams St.
Peoria, IL 61641

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to questions you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of those forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTION	MARK "X" YES	NO	FORM ATTACHED	SPECIFIC QUESTION	MARK "X" YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the wellbore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP KEYSTONE GROUP - BARTONVILLE PLANT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 BENNINGTON DALE MGR. ENVR. ENGR.	309 697 7552

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 7000 SOUTH ADAMS STREET			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 PEORIA	IL	61641	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 7000 SOUTH ADAMS STREET			
B. COUNTY NAME			
PEORIA			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE**
6 PEORIA	IL	61641	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

	A. FIRST	B. SECOND
	3312 (specify) Hot rolled iron and steel products	3315 (specify) Cold drawn carbon steel wire.
	C. THIRD	D. FOURTH
	(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: KEYSTONE GROUP - BARTONVILLE PLANT

Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL M = PUBLIC (other than federal or state)
S = STATE O = OTHER (specify)
P = PRIVATE
P (specify)

D. PHONE (area code & no.): A 309 697 7020

B. STREET OR P.O. BOX: 7000 SOUTH ADAMS STREET

C. CITY OR TOWN: PEORIA

STATE: IL

ZIP CODE: 61641

D. INDIAN LAND: If the facility [illegible] ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	C. RCRA (Hazardous Wastes)
9 N IL0002526	9 R

B. UIC (Underground Injection of Fluids)	C. OTHER (specify)
9 U	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturing of iron and steel including semi-finished and finished wire products.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Nicholas R. Owens Vice President of Manufacturing Keystone Group	Nicholas R. Owens	11-14-8[illegible]

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F I L D 000714881

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
68	01	01

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR OR GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S03	300,000 (for K061)	Y	
2	D80	180 (for K061)	A	
3	T04	20,000 (for K062)	U	
4				
5	T02	20,000 (for K063)	U	
6	D83	36,500,000 (for K063)	G	
7				
8				
9				
10				

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

CODE "T04": Keystone generates approximately 10,000 gallons/day of waste pickle liquor (K062). The K062 waste mixed with all other plant waste streams is pumped to the Waste Water Treatment Plant (WWTP). The WWTP has a design capacity of approximately twice (20,000 gal./day) that which is used. The acidic waste water is pre-neutralized to raise the pH to 5 or greater. This waste water is then lime neutralized and the solids precipitate out in the sedimentation basins. The sludge (K063) is pumped to our sludge storage lagoons.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – *Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle.* If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: *For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III* to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.
2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-980004

280

EPA I.D. NUMBER (enter from page 1): ILD000714881

FOR OFFICIAL USE ONLY: W | DUP | T/A: 2 | C: DUP

II. DESIGNATION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K061	10,000	T	S03 D80	
2	K062	15,000	T	T04	lime neutralization & precipit
3	K063	15,000	T	T02 D83	
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. F I L D 0 0 0 7 1 4 8 8 1 — T/A: 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
40 38 00	89 38 50

VIII. FACILITY OWNER

XX A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E Keystone Consolidated Industries, Inc. Keystone Group, A Division of	309-697-7020

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 7000 South Adams	G Peoria	IL	61641

IX. OWNER CERTIFICATION

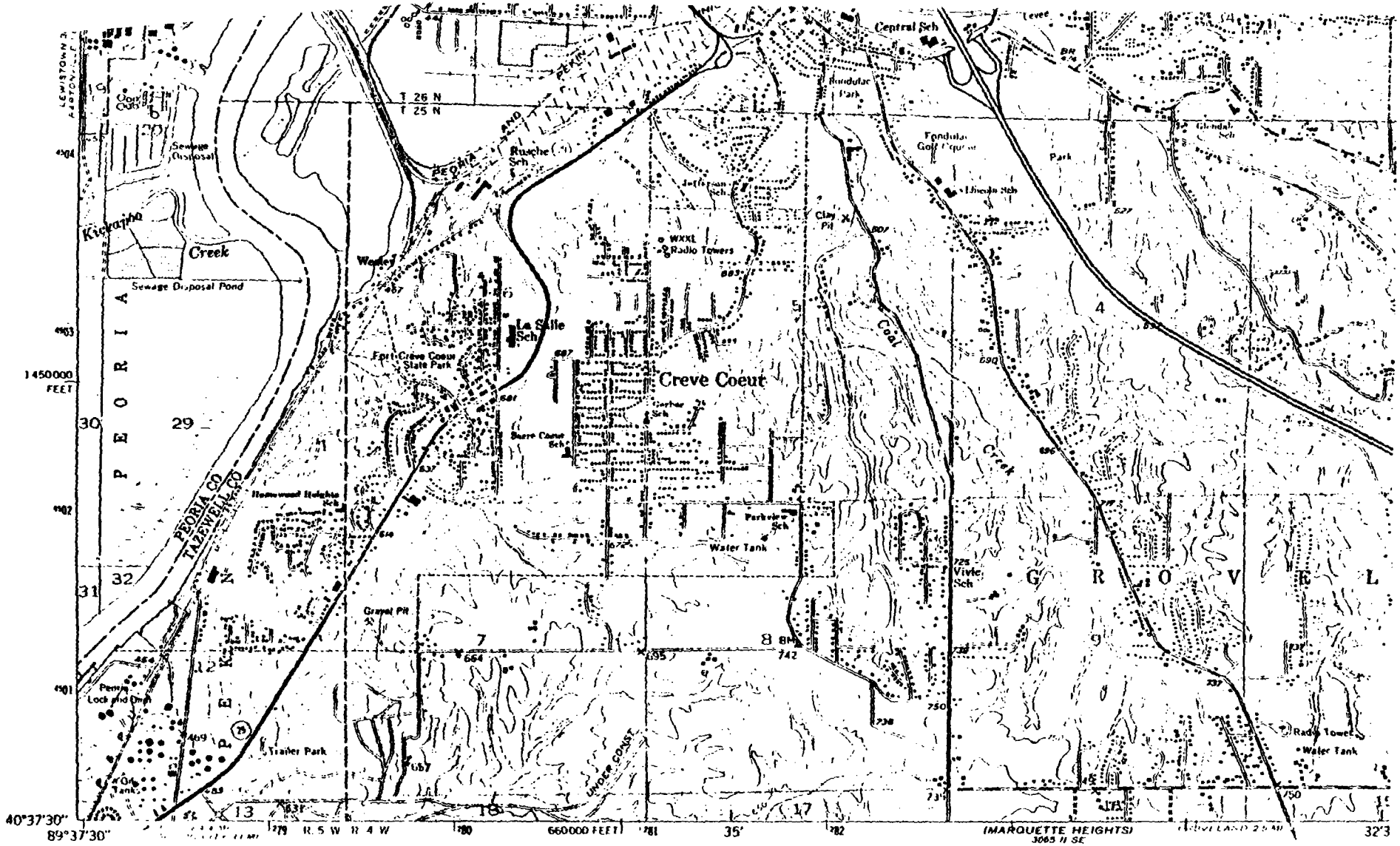
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Nicholas R. Owens Keystone Group-V.P. of Manufacturing	for N.R. Owens	11-14-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED



Mapped, edited, and published by the Geological Survey

Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1946 and planetable surveys 1948-49

Polyconic projection. 1927 North American datum
10,000-foot grid based on Illinois coordinate system, west zone
1000-meter Universal Transverse Mercator grid ticks, zone 16, shown in blue

Red tint indicates area in which only landmark buildings are shown

Dashed light-blue pattern indicates area subject to infrequent inundation above Fondulac Dam

Revisions shown in purple compiled from aerial photographs taken 1967. This information not field checked

Purple tint indicates extension of urban areas

UTM GRID AND 1967 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

Map photoinspected 1972
No major culture or drainage changes observed

SCALE 1:24000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

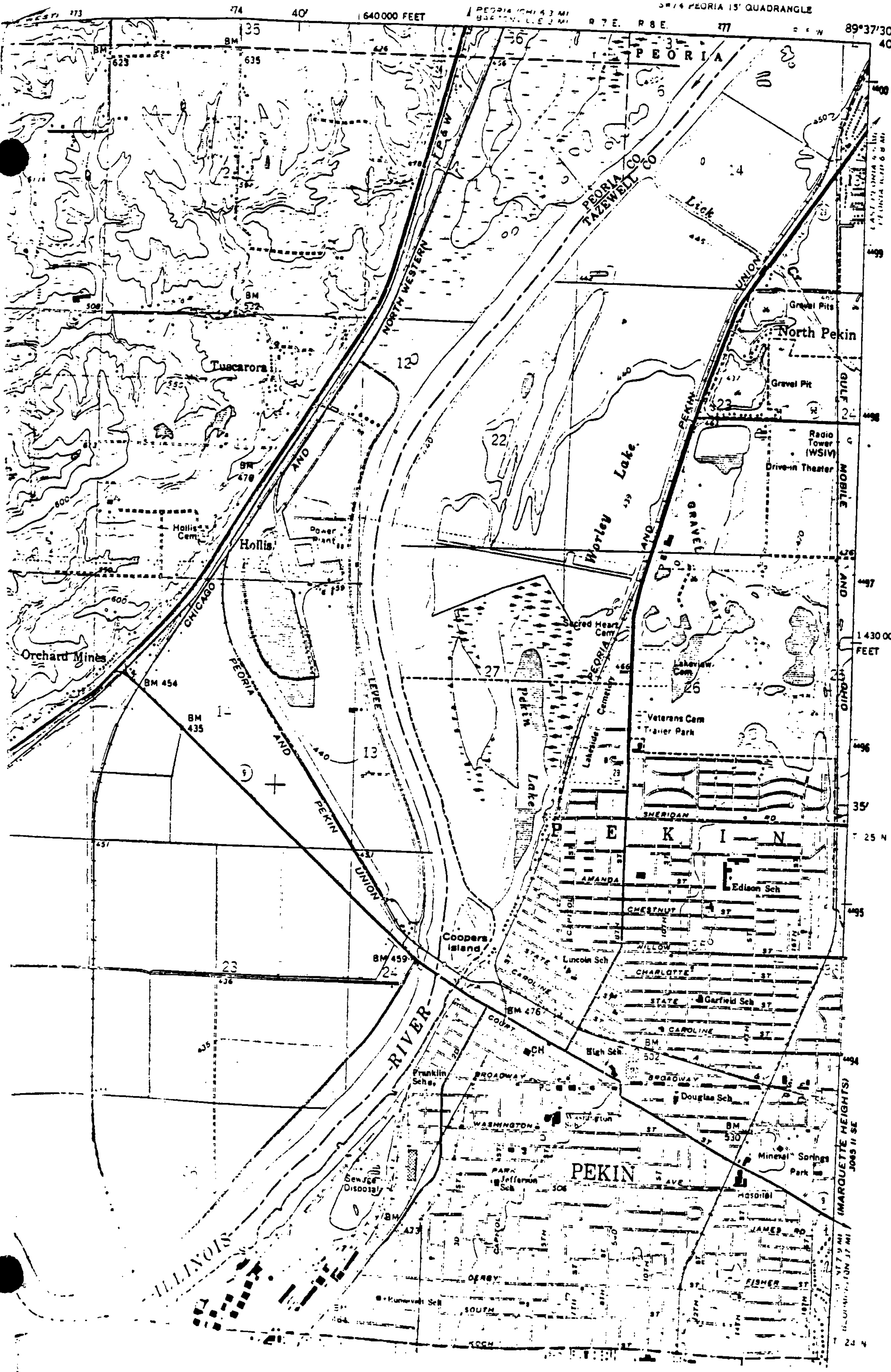
THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, RESTON, VIRGINIA 22092
AND BY THE STATE GEOLOGICAL SURVEY, URBANA, ILLINOIS 61801
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

A EAST, ILL.
.5-W8930/7.5

1949

REVISED 1967

NE-SERIES V863


PEORIA 15' QUADRANGLE
640 000 FEET
R 7 E.
R 8 E.
89°37'30"
40°37'30"
PEORIA
PEORIA CO
TAZEWELL CO
Lick
Cr
CHICAGO AND NORTH WESTERN
UNION
PEKIN AND UNION
Gravel Pits
North Pekin
Gravel Pit
Radio Tower (WSIV)
Drive-in Theater
GULF MOBILE AND OHIO
Tuscarora
Worley Lake
GRAVEL PIT
Hollis Cem
Hollis
Power Plant
Sacred Heart Cem
Lakeview Cem
1 430 000 FEET
Orchard Mines
BM 454
BM 435
PEORIA AND PEKIN UNION
LEVEE
Pekin Lake
Lakeside Cemetery
Veterans Cem
Trailer Park
SHERIDAN RD
P E K I N
T 25 N
AMANDA ST
Edison Sch
CHESTNUT ST
WILLOW ST
Coopers Island
BM 459
STATE
CAROLINE
Lincoln Sch
CHARLOTTE ST
Garfield Sch
BM 476
COURT
High Sch
BM 502
RIVER
Franklin Sch
BROADWAY
Douglas Sch
WASHINGTON ST
BM 530
Mineral Springs Park
PEKIN
Jefferson Sch
Sewage Disposal
Hospital
JAMES RD
(MARQUETTE HEIGHTS)
ILLINOIS
DERBY
FISHER ST
SOUTH
KOCH
T 24 N

PHOTOREVISED 1967
AMS 3065 II SE-SERIES V863

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

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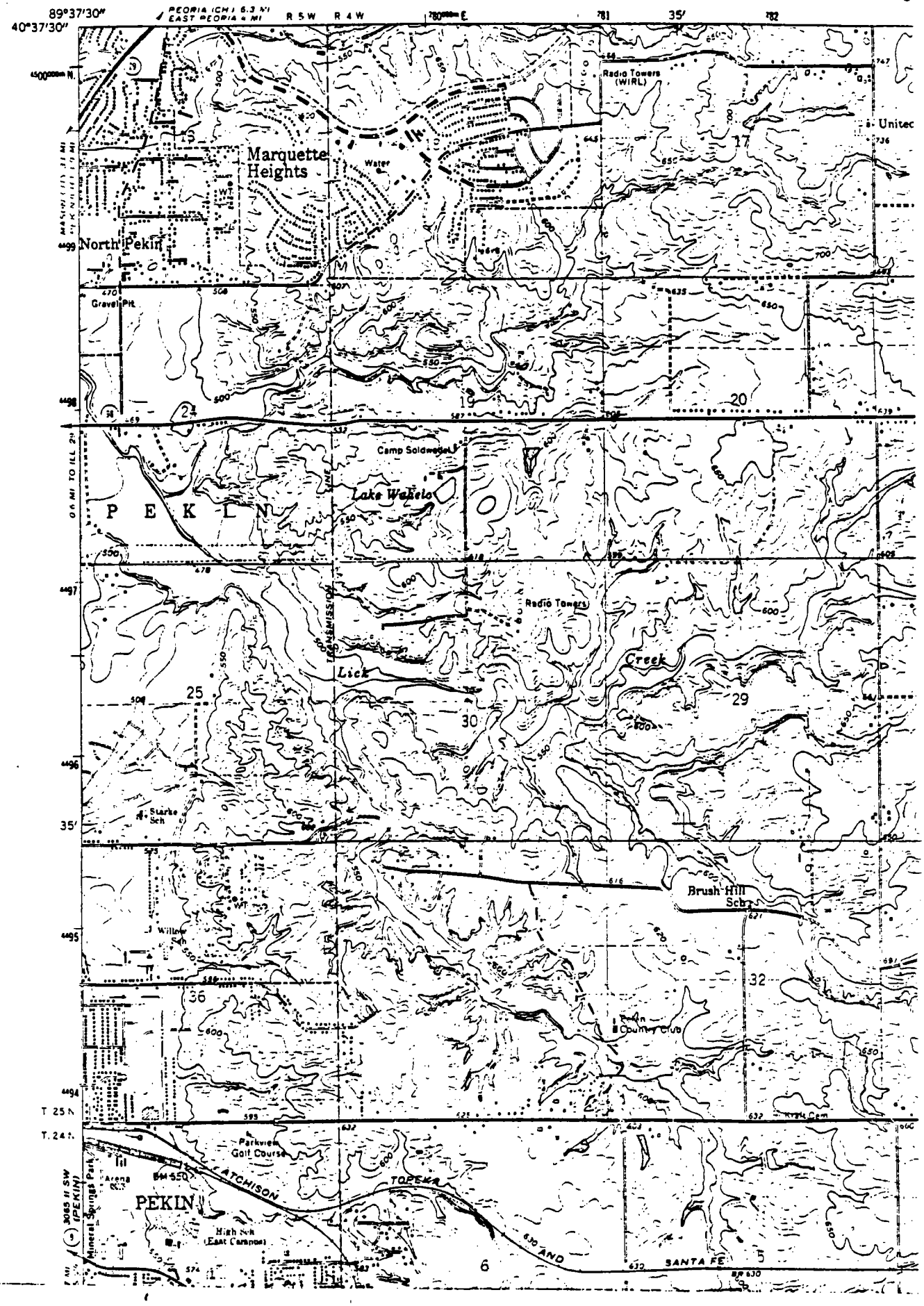
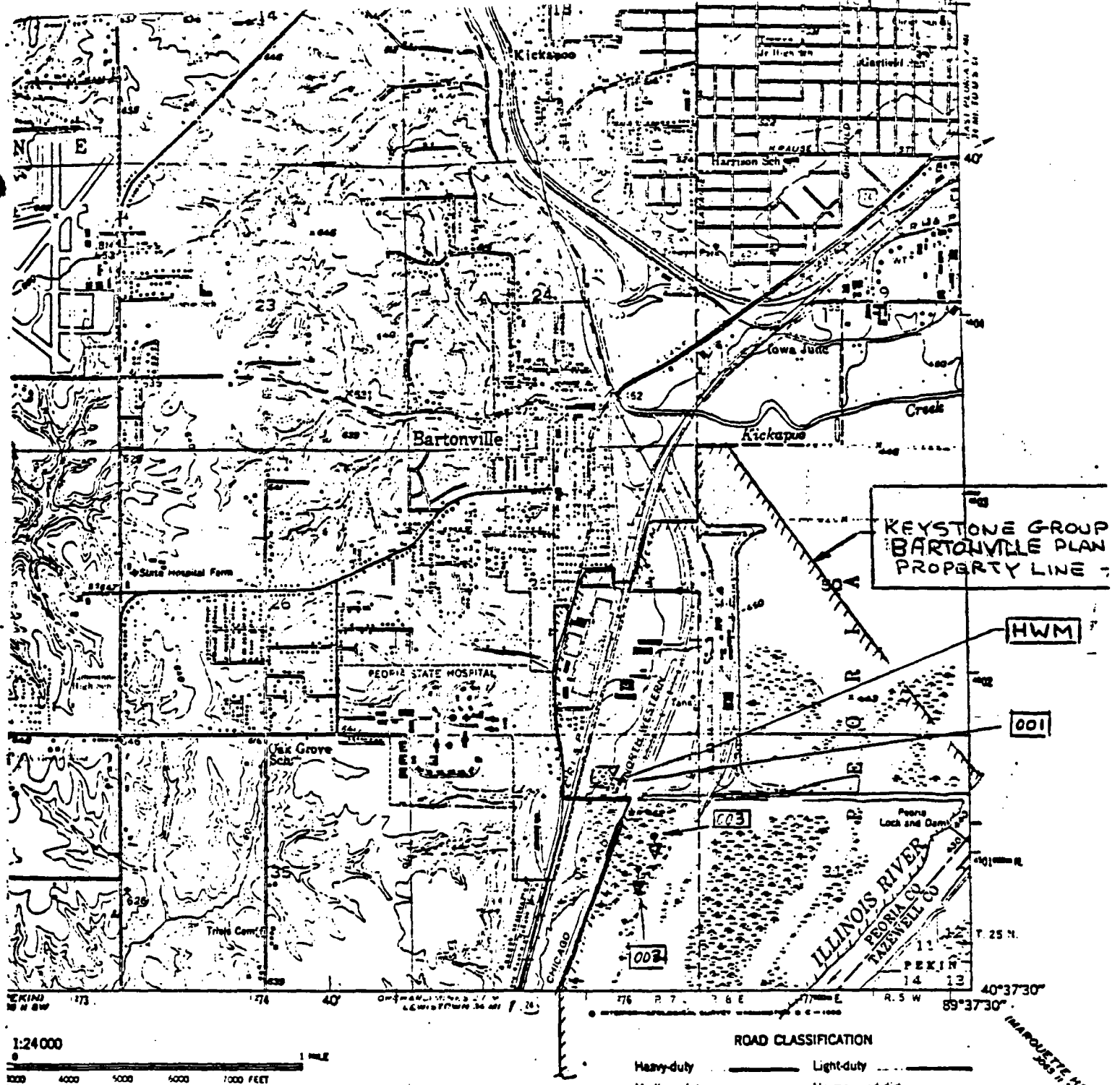
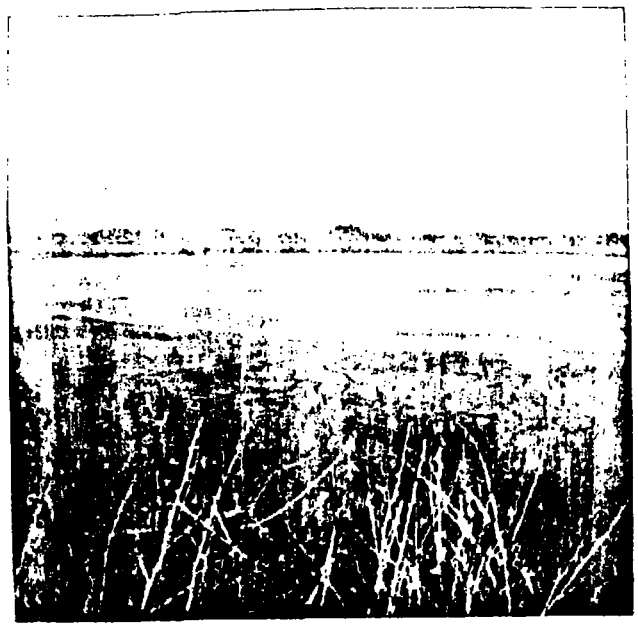


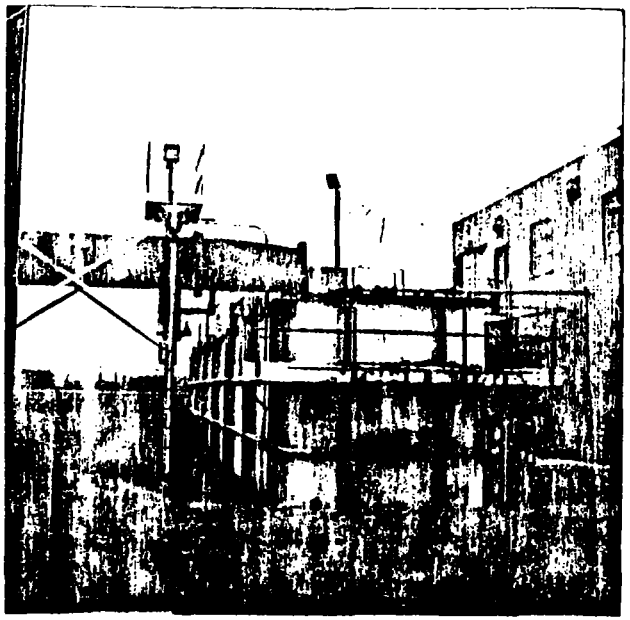


LOCATION MAP
KEYSTONE GROUP - BARTONVILLE
PEORIA ILL 61641



NORTH SLUDGE LAGOON
BARTONVILLE WWTP
LOOKING EAST

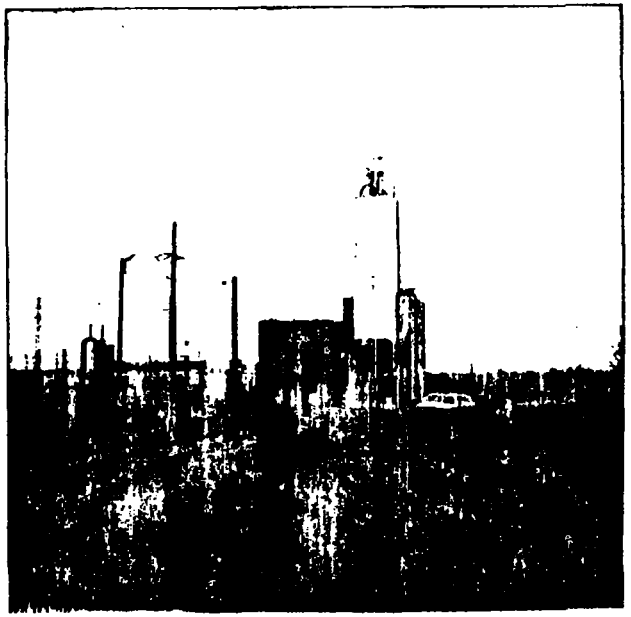
11-14-80



NEUTRALIZATION TANK
BARTONVILLE WWTP
LOOKING EAST

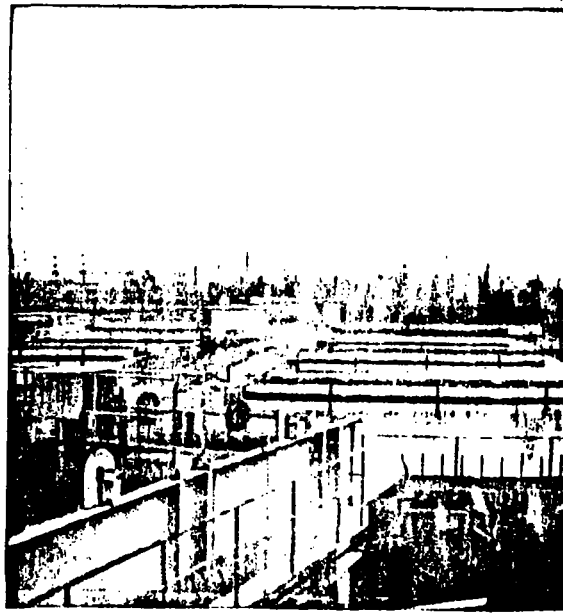
11-14-80

SOUTH SLUDGE LAGOON
BARTONVILLE WWTP

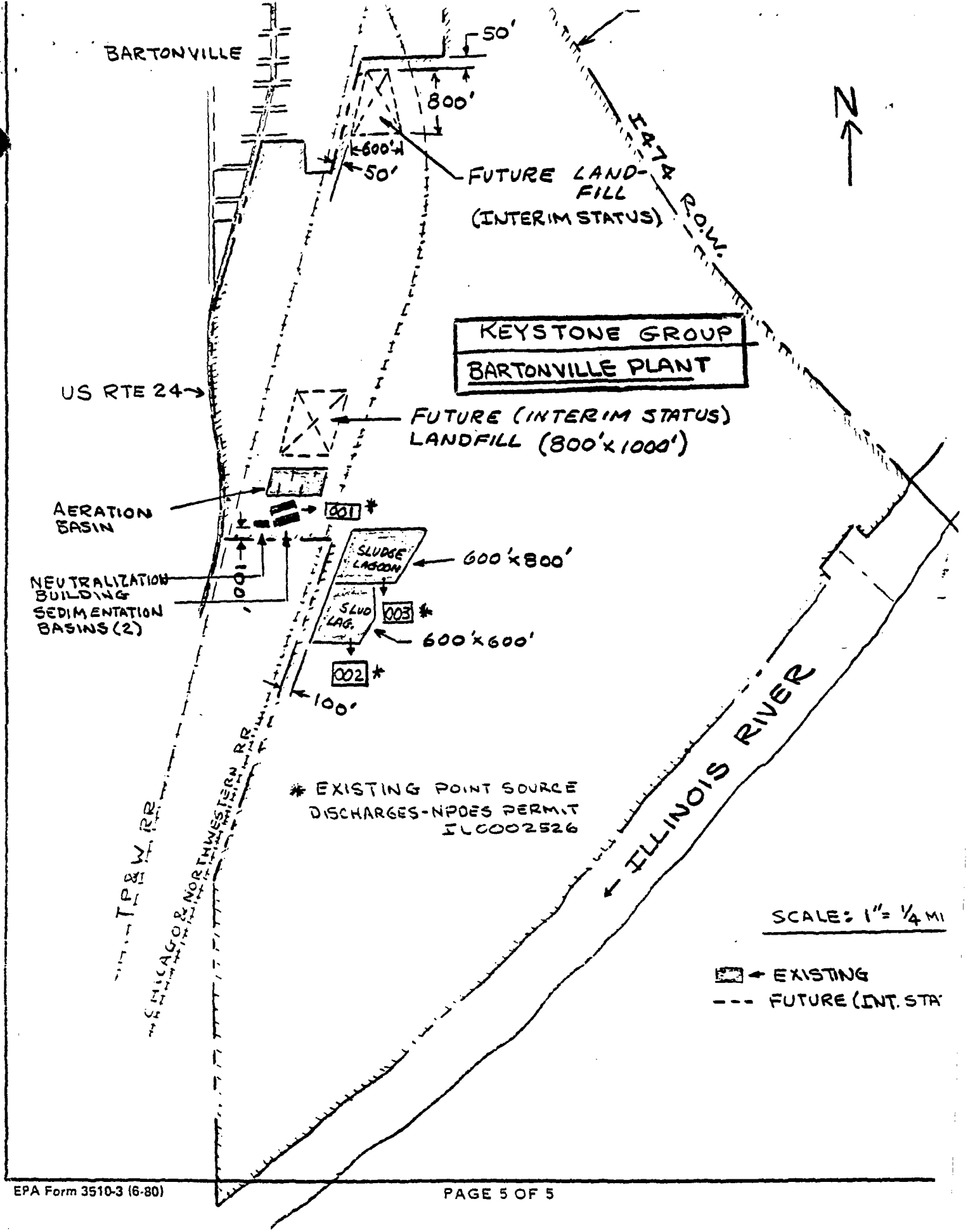


BARTONVILLE WWTP BLDG
LOOKING EAST

11-14



SEDIMENTATION BASINS
BARTONVILLE WWTP
LOOKING EAST



PEORIA ILL 61641